

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHERYL MILLER,

Plaintiff,

v.

Case No. 3:21-cv-12259

Hon. Robert H. Cleland

Magistrate Judge
Anthony P. Patti

WILLIAM BEAUMONT HOSPITAL dba
BEAUMONT HEALTH SYSTEM,

Defendant.

DEPONENT: SHERYL LYNN MILLER

DATE: Thursday, November 10, 2022

TIME: 9:38 a.m. EDT

LOCATION: Via Zoom videoconference

REPORTER: Anne H. Chilton, CSR-3669

JOB NO: 21040

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<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 CARLA A. AIKENS, P.L.C.</p> <p>4 By: Austen J. Shearouse, Esq.</p> <p>5 615 Griswold Street, Suite 709</p> <p>6 Detroit, Michigan 48226</p> <p>7 (844) 835-2993</p> <p>8 austen@aikenslawfirm.com</p> <p>9 Appearing on behalf of the Plaintiff.</p> <p>10</p> <p>11 JACKSON LEWIS, P.C.</p> <p>12 By: Katherine J. Van Dyke, Esq.</p> <p>13 Elyse K. Culberson, Esq.</p> <p>14 Lauren Parrottino, Esq.</p> <p>15 2000 Town Center, Suite 1650</p> <p>16 Southfield, Michigan 48075</p> <p>17 (248) 936-1900</p> <p>18 katherine.vandyke@jacksonlewis.com</p> <p>19 elyse.culberson@jacksonlewis.com</p> <p>20 lauren.parrottino@jacksonlewis.com</p> <p>21 Appearing on behalf of the Defendant.</p> <p>22</p> <p>23 ALSO PRESENT: Jennifer A. Zinn, Esq.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 Thursday, November 10, 2022</p> <p>2 Via Zoom videoconference</p> <p>3 About 9:38 a.m. EDT</p> <p>4 * * *</p> <p>5 (All participants appearing via Zoom videoconference)</p> <p>6 THE REPORTER: My name is Anne Chilton,</p> <p>7 certified stenographic reporter and notary public in</p> <p>8 the State of Michigan.</p> <p>9 This deposition is being held via</p> <p>10 videoconferencing equipment. The witness and reporter</p> <p>11 are not in the same room. The parties and their</p> <p>12 counsel consent to this arrangement and waive any</p> <p>13 objections to this manner of reporting.</p> <p>14 Counsel, please indicate your agreement by</p> <p>15 stating your name and your agreement on the record,</p> <p>16 and please announce anyone else in the room with you.</p> <p>17 MR. SHEAROUSE: Austen Shearouse, P84852, and</p> <p>18 I consent.</p> <p>19 MS. VAN DYKE: Kay Van Dyke on behalf of the</p> <p>20 defendant, I also consent, and with me today is, from</p> <p>21 my firm, Elyse Culberson and Lauren Parrottino, and I</p> <p>22 also have Jennifer Zinn, who is with Beaumont.</p> <p>23 THE REPORTER: Miss Miller, raise your right</p> <p>24 hand, please.</p> <p>25 SHERYL LYNN MILLER,</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 WITNESS</p> <p>3</p> <p>4 SHERYL LYNN MILLER PAGE</p> <p>5</p> <p>6 Examination by Ms. Van Dyke 5</p> <p>7</p> <p>8</p> <p>9 EXHIBITS</p> <p>10</p> <p>11 NUMBER DESCRIPTION PAGE</p> <p>12</p> <p>13 Exhibit 1 Complaint 25</p> <p>14 Exhibit 2 E-mail, March 23, 2020 57</p> <p>15 Exhibit 3 Corrective Action Form 105</p> <p>16 Exhibit 4 19 pages of notes 107</p> <p>17 (Exhibits attached to transcript)</p> <p>18 * * *</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 after having been first duly sworn to tell the</p> <p>2 truth, the whole truth, and nothing but the</p> <p>3 truth, was examined and testified as follows:</p> <p>4 THE WITNESS: I do.</p> <p>5 THE REPORTER: Thank you.</p> <p>6 EXAMINATION</p> <p>7 BY MS. VAN DYKE:</p> <p>8 Q. Miss Miller, we've introduced ourselves already, so --</p> <p>9 A. Oh. Oh, I'm sorry.</p> <p>10 Q. Oh, no. That's okay. Can you hear me?</p> <p>11 A. Yeah. So I'm Sheryl Lynn Miller. I work for Beaumont</p> <p>12 and I work for patient access, yeah, the PAR</p> <p>13 department.</p> <p>14 Q. Okay. All right. Have you had your deposition taken</p> <p>15 before?</p> <p>16 A. No.</p> <p>17 Q. No? Okay. Have you had your deposition taken before</p> <p>18 in other cases at all?</p> <p>19 A. No.</p> <p>20 Q. All right. Let me go over a few ground rules, then,</p> <p>21 for today in terms of how the deposition is going to</p> <p>22 go, and what we'll do is --</p> <p>23 You've taken an oath, and it's the same oath</p> <p>24 that you would take if you were to testify before the</p> <p>25 judge or a jury in court, and so the same penalties of</p>

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<p style="text-align: right;">Page 6</p> <p>1 perjury apply.</p> <p>2 And next is to please listen carefully to my</p> <p>3 question because if you don't understand what I'm</p> <p>4 asking, please ask me to repeat it or let me know you</p> <p>5 don't understand, because if you provide an answer,</p> <p>6 it's assumed that you understood the question, if that</p> <p>7 makes sense.</p> <p>8 A. Okay.</p> <p>9 Q. All right. And then the next is -- and hopefully your</p> <p>10 attorney and I will catch this, but I know it's very</p> <p>11 easy to nod your head or say yes or anything like</p> <p>12 that, and so -- or not say yes, but nod your head or</p> <p>13 do a nonverbal answer. And so we'll try to catch that</p> <p>14 and ask you to say either yes or no so that it's put</p> <p>15 on the record that way in writing in terms of a verbal</p> <p>16 answer.</p> <p>17 The next is that if you need a break at all,</p> <p>18 please let me know. I only ask that, if there's a</p> <p>19 question on the table from me, that you first answer</p> <p>20 the question before we go into that break, but we can</p> <p>21 take a break whenever you need.</p> <p>22 So is there --</p> <p>23 Have you consumed or had any medication or</p> <p>24 anything that would impair your testimony today?</p> <p>25 A. I took my Xanax this morning.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. And are you currently married?</p> <p>2 A. Yes.</p> <p>3 Q. And to whom?</p> <p>4 A. Matthew John Miller.</p> <p>5 Q. Have you had any other marriages?</p> <p>6 A. No.</p> <p>7 Q. Where do you currently live?</p> <p>8 A. 14620 Syracuse, S-y-r-a-c-u-s-e, Street in Taylor,</p> <p>9 Michigan.</p> <p>10 Q. All right. Do you live with your husband currently?</p> <p>11 A. Yes.</p> <p>12 Q. Anyone else live with you?</p> <p>13 A. No.</p> <p>14 Q. Do you have any children?</p> <p>15 A. Yes.</p> <p>16 Q. How many and ages?</p> <p>17 A. Three. 31, 29, and 25.</p> <p>18 Q. Okay. And what are their ages, or, I'm sorry, what</p> <p>19 are their names?</p> <p>20 A. Mary, Matthew, and Jessica.</p> <p>21 Q. And in the last five years have you lived elsewhere?</p> <p>22 A. No.</p> <p>23 Q. How long have you lived at your current residence?</p> <p>24 A. Give me one second. I'm counting.</p> <p>25 Q. Yeah. Roughly.</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Okay. Is there any illness or condition that would</p> <p>2 also impair your testimony today?</p> <p>3 A. I have asthma and COPD, so at times I have to take my</p> <p>4 inhaler.</p> <p>5 Q. Okay. All right. And so if we need to take a break</p> <p>6 for you to do so, definitely let me know.</p> <p>7 A. Okay.</p> <p>8 Q. And then the only other thing, and the court reporter</p> <p>9 may yell at us if we do this, but it is very easy to</p> <p>10 talk over each other at times, especially I find it on</p> <p>11 Zoom it happens a little more often. And so, you</p> <p>12 know, I just ask that you take a second to make sure</p> <p>13 I'm done with my question, and I'll do the same when</p> <p>14 you're answering. I'll take an extra second to make</p> <p>15 sure you're done answering so we're not trying to talk</p> <p>16 over each other because that makes the court</p> <p>17 reporter's job really difficult.</p> <p>18 A. Okay.</p> <p>19 Q. All right. So you provided your name.</p> <p>20 Have you been known by any other names?</p> <p>21 A. Yes. My maiden name, Sheryl Lynn Harpster.</p> <p>22 Q. Can you spell Harpster?</p> <p>23 A. H-a-r-p-s-t-e-r.</p> <p>24 Q. What is your date of birth?</p> <p>25 A. 12/26/1967.</p>	<p style="text-align: right;">Page 9</p> <p>1 A. 12 to 13 years.</p> <p>2 Q. Have you ever lived outside of Michigan?</p> <p>3 A. Forgot my dogs. I'm sorry.</p> <p>4 Q. Oh, that's okay.</p> <p>5 A. Will you give me one second? I'm so sorry.</p> <p>6 Q. Oh, no, no. That's fine. Yeah.</p> <p>7 (Off the record at 9:44 a.m.)</p> <p>8 (Back on the record at 9:45 a.m.)</p> <p>9 MS. VAN DYKE: Okay. We can go back on the</p> <p>10 record.</p> <p>11 BY MS. VAN DYKE:</p> <p>12 Q. And I apologize. I think I asked you if you've lived</p> <p>13 anywhere outside of Michigan.</p> <p>14 A. No.</p> <p>15 Q. Okay. Have you ever been a party to a lawsuit or</p> <p>16 legal proceeding before?</p> <p>17 A. There was one with CVS.</p> <p>18 Q. Okay. And what was that one about?</p> <p>19 A. It was for my unemployment.</p> <p>20 Q. Was it in court, the CVS case?</p> <p>21 A. It didn't go that far. There was a judge, but it was</p> <p>22 a judge for unemployment so I'd get my workman -- my</p> <p>23 unemployment wages.</p> <p>24 Q. Okay. All right. We can come back to that in a</p> <p>25 second, too, when we go through -- I wanted to go</p>

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<p style="text-align: right;">Page 10</p> <p>1 through your prior employment.</p> <p>2 Did you testify at the unemployment hearing?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 A. They made us swear to tell the truth.</p> <p>6 Q. How long ago was that?</p> <p>7 A. Oh. Almost 20 years ago.</p> <p>8 Q. Okay.</p> <p>9 A. Around that. I don't know the exact date.</p> <p>10 Q. All right. Have you ever filed a charge with the --</p> <p>11 Other than this current case, have you ever</p> <p>12 filed a charge with the EEOC or the Michigan</p> <p>13 Department of Civil Rights against an employer?</p> <p>14 A. No.</p> <p>15 Q. Have you ever been convicted of a crime?</p> <p>16 A. No.</p> <p>17 Q. And have you ever filed for bankruptcy?</p> <p>18 A. No.</p> <p>19 Q. In preparation for today -- and I'm going to ask you</p> <p>20 some questions. What I don't want to know is what</p> <p>21 you've talked about with your lawyers, if you did meet</p> <p>22 with them.</p> <p>23 Did you look at any documentation to prepare</p> <p>24 for today?</p> <p>25 A. Yes. I have it in front of me.</p>	<p style="text-align: right;">Page 12</p> <p>1 notes about Beaumont?</p> <p>2 A. I had -- I'd write them down as I would go at times</p> <p>3 and then other time -- and then I ended up losing one,</p> <p>4 too, which really stunk, but yes. I mean, I have</p> <p>5 some.</p> <p>6 Q. And so did you have like one notebook towards that or</p> <p>7 it was just taken randomly on different notes?</p> <p>8 A. It was both.</p> <p>9 Q. Did you produce everything in terms of your notes</p> <p>10 about Beaumont?</p> <p>11 A. All the way up to what has been going on recently,</p> <p>12 yes.</p> <p>13 Q. All right. So there might be -- you may have notes or</p> <p>14 you do have notes.</p> <p>15 A. I do.</p> <p>16 Q. Do you use Facebook or other social media?</p> <p>17 A. I only go on Facebook for my daughter. She's --</p> <p>18 she -- or I text my friend in Idaho.</p> <p>19 I don't go on Facebook or any of that really</p> <p>20 too much. I think it's nothing but -- yeah. I just</p> <p>21 don't use it. I just don't use it like most people.</p> <p>22 Q. Okay. Have you ever communicated or are you friends</p> <p>23 with anyone on Facebook from Beaumont?</p> <p>24 A. No.</p> <p>25 Q. Have you ever discussed working at Beaumont on</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. And what docu- --</p> <p>2 A. My proof. That's all I have.</p> <p>3 Q. And what is that that you looked at?</p> <p>4 A. Everything I sent my lawyer. I have my W-2s. I have</p> <p>5 my e-mails. You know, basically the whole -- most of</p> <p>6 the list on your list.</p> <p>7 Q. Oh. The list --</p> <p>8 A. Most of it.</p> <p>9 Q. Okay.</p> <p>10 A. What's ever on the list that you sent me.</p> <p>11 Q. Yeah. And that -- and that actually was my next</p> <p>12 question. I want to make sure.</p> <p>13 MS. VAN DYKE: Austen, did you receive the</p> <p>14 exhibit?</p> <p>15 MR. SHEAROUSE: Yes, I did.</p> <p>16 MS. VAN DYKE: Okay. So that's what Miss</p> <p>17 Miller is referring to?</p> <p>18 MR. SHEAROUSE: Yes.</p> <p>19 MS. VAN DYKE: Okay. All right.</p> <p>20 BY MS. VAN DYKE:</p> <p>21 Q. Yeah, and I saw, too, to run through that, in some of</p> <p>22 the documents that you produced I noticed that you</p> <p>23 kept some notes, handwritten notes.</p> <p>24 A. Yes.</p> <p>25 Q. Did you keep a diary or a notebook specifically for</p>	<p style="text-align: right;">Page 13</p> <p>1 Facebook?</p> <p>2 A. No.</p> <p>3 Q. All right. So what is your highest level of</p> <p>4 education?</p> <p>5 A. I have an associate's degree in registration health</p> <p>6 technician or medical billing, or not medical billing,</p> <p>7 I'm sorry, for medical records, sorry, my mistake,</p> <p>8 medical records, RHIT.</p> <p>9 Q. Where did you obtain your associate's degree from?</p> <p>10 A. Baker College in Allen Park.</p> <p>11 Q. What year did you graduate?</p> <p>12 A. 2010.</p> <p>13 Q. And then for the medical records, where did you go for</p> <p>14 that?</p> <p>15 A. That's what I'm saying. That was part of it, that</p> <p>16 RHIT.</p> <p>17 Q. Okay. So that was part of it. You didn't go to a</p> <p>18 separate school for that.</p> <p>19 A. No. No.</p> <p>20 Q. All right. Do you have any certifications or</p> <p>21 certificates?</p> <p>22 A. Yes.</p> <p>23 Q. And what are those?</p> <p>24 A. I have one in database, and that was in 1987. I have</p> <p>25 one from Ross Business Institute for computer office</p>

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<p style="text-align: right;">Page 14</p> <p>1 specialist. Of course, I have my high school diploma, 2 and I have Baker College, associate's degree. 3 Q. So the database, I believe you said it was 1987? 4 A. When I graduated from high school. 5 Q. All right. And what about the office specialist? 6 A. Give me a second. Let me grab it. 7 December 10th, 1992. 8 Q. Where is that from? 9 A. Ross Business Institute. 10 Q. All right. I definitely want to go through your prior 11 work experience, and so before you came to Beaumont, 12 where did you work? 13 A. At Home Health Services out in Commerce Township, 14 Michigan. 15 Q. About how long did you work there for? 16 A. I think it was two and a half, three -- two and a half 17 to three years. 18 Q. Do you recall -- 19 What was your position there? 20 A. I was a intake coordinator, and I also reviewed the 21 charts for patients to be submitted to Medicare and 22 Medicaid and sent it over to the billers. I also was 23 the manager over there for the whole office. I ran 24 the whole office basically. Nobody else was in the 25 office but me.</p>	<p style="text-align: right;">Page 16</p> <p>1 A. They were closed as far as I know. 2 Q. Did -- oh. Did Great Lakes Wellness close? 3 A. Yes. 4 Q. Okay. When did it close, if you know? 5 A. I don't know when they closed. It was way after I was 6 gone. 7 Q. When did you leave Great Lakes Wellness, roughly? 8 A. It was in May, May of 2017, and then I started with 9 you guys June. 10 Q. Why did you leave Great Lakes Wellness? 11 A. Again, because it's too far of a distance for going to 12 Eastpointe and for -- actually for higher pay. 13 Q. All right. Do you recall any other prior employers? 14 A. I also worked for National Home Care, and I worked for 15 At Home Health Service, or not -- I'm sorry -- Angel 16 Touch -- Angel Touch Home Health Care. 17 Q. All right. For National Home Care, approximately when 18 did you work there? 19 A. I don't remember the dates. 20 Q. Does 2013 sound about right? 21 A. 2020? 22 Q. 2013. 2013. 23 A. It could be. I'd have to look. 24 Q. Who did you report to at National Home Care? 25 A. I don't remember his name no more.</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. At some point you left there, correct? 2 A. Yes. 3 Q. And why is that? 4 A. Because I live in Taylor and I had to drive all the 5 way out to Commerce and it took me an hour, hour and a 6 half, up to three hours come back east. So I needed 7 closer -- something closer to home. 8 Q. Okay. Before At Home Health where did you work? 9 A. East -- 10 Okay. Hang on a minute. 11 It was called Great Lakes Wellness and Health 12 or Health and Wellness out in Eastpointe. 13 Q. What dates did you work there? 14 A. Oh. I don't remember the exact date. It was right 15 one after another. So -- 16 I have to look at my resumé. 17 Q. And the reason -- 18 A. I don't remember. 19 Q. The reason we're -- 20 We did ask for their records, and the 21 response we received -- there is a question in this, 22 but the response we received is that the paper file 23 was removed by a government agency. 24 A. Um-hum. 25 Q. Do you know what that could be about?</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Is -- does the name Khurram Baig -- I might be 2 slaughtering the pronunciation here. Does that sound 3 familiar? 4 A. He was -- he was a different culture, so I can't 5 pronounce his -- it might be Khurram or something like 6 that. 7 Q. Is that who you reported to? 8 A. Yes. He's the manager and owner. 9 Q. All right. And for the court reporter it's 10 K-h-u-r-r-a-m and then B-a-i-g. 11 What were your duties at National Home Care? 12 A. I was a intake coordinator, and I also submitted 13 invoices, government. I submitted it to another 14 biller -- to the nurse. I reviews -- I would scrub it 15 and then the nurse would review it and then she would 16 do the bill. 17 Q. How long did you work there for? 18 A. About two years. 19 Q. And why did you leave? 20 A. Again, I was trying to advance my career. 21 Q. Were you -- was your employment terminated or did you 22 resign? 23 A. I resigned. 24 Q. When you resigned, did you take your personnel file 25 with you?</p>

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<p style="text-align: right;">Page 18</p> <p>1 A. No.</p> <p>2 Q. All right. Mr. Baig, if that's how you pronounce it,</p> <p>3 responded to our subpoena request and it described you</p> <p>4 as very hostile.</p> <p>5 A. Hmm.</p> <p>6 Q. Did you ever have conversations with him about that?</p> <p>7 A. He -- the --</p> <p>8 He was very hostile, I was not.</p> <p>9 Q. Did he ever discipline you?</p> <p>10 A. No.</p> <p>11 Q. And how was he hostile towards you?</p> <p>12 A. He was very verbally hostile, demeaning.</p> <p>13 Q. Would you get in disagreements with him?</p> <p>14 A. Some.</p> <p>15 Q. Was he like this with other employees as well?</p> <p>16 A. Yes.</p> <p>17 Q. And do you recall the names of other people you worked</p> <p>18 with there?</p> <p>19 A. I don't remember their names anymore. There was</p> <p>20 another -- there was a nurse who quit because of him.</p> <p>21 Q. And before --</p> <p>22 Did you also work at Downriver Internists, or</p> <p>23 is that -- no. That's your doctor. Yes?</p> <p>24 A. That's my doctor.</p> <p>25 Q. Okay. Do you recall any other prior employers?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. They fired me illegally.</p> <p>2 Q. All right. And how did they illegally fire you?</p> <p>3 A. They claimed that I had taken something when the</p> <p>4 pharmacist had gave it to me, and then the pharmacist</p> <p>5 testified at the court hearing.</p> <p>6 Q. Okay. And what did they claim you took that the</p> <p>7 pharmacist had given you?</p> <p>8 A. A Zyrtec-D.</p> <p>9 Q. All right. Here, I'm scrolling down, too.</p> <p>10 What happened with this case?</p> <p>11 A. I won with the unemployment, get my unemployment</p> <p>12 benefits back, but I lost on that one.</p> <p>13 Q. On this case? Okay.</p> <p>14 Do you recall there being an investigation</p> <p>15 for you taking medication other than the Zyrtec?</p> <p>16 A. No.</p> <p>17 Q. All right.</p> <p>18 A. I know nothing about that.</p> <p>19 Q. All right. Do you recall there being claims that you</p> <p>20 took either oxy or morphine from them?</p> <p>21 A. No. I was never on that medication.</p> <p>22 Q. All right. But you did admit to --</p> <p>23 According to the lawsuit or CVS's claims, you</p> <p>24 admitted to taking -- or taking Zyrtec and pop,</p> <p>25 correct?</p>
<p style="text-align: right;">Page 19</p> <p>1 A. CVS.</p> <p>2 Q. I need one second here. Sorry. My computer is taking</p> <p>3 a little longer.</p> <p>4 Did you -- do you recall filing a lawsuit</p> <p>5 against CVS in the Michigan Eastern District Court?</p> <p>6 A. I thought it was for unemployment, but I may have.</p> <p>7 Q. Do you know who Dennis Snyder is?</p> <p>8 A. No.</p> <p>9 Q. No?</p> <p>10 All right. I'm going to share my screen with</p> <p>11 you to see if you recognize this document.</p> <p>12 A. Okay.</p> <p>13 Q. It might take a second here.</p> <p>14 Sorry about that, you guys. Hold on.</p> <p>15 Okay. Can you see the screen?</p> <p>16 A. Um-hum.</p> <p>17 Q. All right. Take a look at this Complaint. I don't</p> <p>18 think I have it in the documents that were sent over</p> <p>19 to you.</p> <p>20 A. Okay.</p> <p>21 Q. Does this look familiar to you?</p> <p>22 A. Yes.</p> <p>23 Q. All right. Do you recall filing a lawsuit now?</p> <p>24 A. Yes.</p> <p>25 Q. All right. What was this lawsuit about?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. I did not -- no. I did not admit to taking it. I did</p> <p>2 not admit to it. I told him I did not take it. The</p> <p>3 pharmacist gave it to me till the prescription came</p> <p>4 in.</p> <p>5 Q. Okay. And then there are allegations in here that you</p> <p>6 also took pop from CVS. Does that sound right?</p> <p>7 A. That's a lie. I never did that.</p> <p>8 Q. All right.</p> <p>9 A. I don't even know where all that came from.</p> <p>10 Q. Was your deposition taken in this case?</p> <p>11 A. Yes, but they never asked any of that.</p> <p>12 Q. But you were deposed in this case.</p> <p>13 A. What's deposed?</p> <p>14 Q. Like the attorney asked you questions like I'm doing</p> <p>15 today.</p> <p>16 A. Yes.</p> <p>17 Q. All right. Did you forget about this case?</p> <p>18 A. Yes, I did.</p> <p>19 Q. All right. Because when I previously asked you if</p> <p>20 you'd been deposed, you said no.</p> <p>21 A. I did not understand the word deposed.</p> <p>22 Q. Other than CVS --</p> <p>23 And to lay the foundation here, did CVS fire</p> <p>24 you?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 22</p> <p>1 Q. Stop share.</p> <p>2 Other than CVS, have you been fired from any</p> <p>3 other jobs?</p> <p>4 A. No.</p> <p>5 Q. You currently work for Beaumont, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And which location do you work out of?</p> <p>8 A. The Trenton Beaumont Hospital.</p> <p>9 Q. Where did you start working at Beaumont?</p> <p>10 A. Taylor Hos- -- Taylor Beaumont Hospital.</p> <p>11 Q. How long were you at Taylor for?</p> <p>12 A. A year, year and a half. I started in June of 2017,</p> <p>13 June 5th, and I think I transferred in late '18, maybe</p> <p>14 beginning of '19, somewhere around there.</p> <p>15 Q. Why did you transfer over to Trenton?</p> <p>16 A. For a day job.</p> <p>17 Q. What shift were you working at Taylor?</p> <p>18 A. Afternoons.</p> <p>19 Q. Have you always been day at Trenton?</p> <p>20 A. Yes.</p> <p>21 Q. What is your pay currently at Beaumont?</p> <p>22 A. \$18.56.</p> <p>23 Q. Do you have any other sources of income?</p> <p>24 A. No.</p> <p>25 Q. Have you looked for other employment?</p>	<p style="text-align: right;">Page 24</p> <p>1 A. They've gone to -- they've used other people stating</p> <p>2 that they have more qualified people at this time, to</p> <p>3 reapply later.</p> <p>4 Q. Have you applied --</p> <p>5 The positions you're applying for, are they</p> <p>6 administration?</p> <p>7 A. Yes.</p> <p>8 Q. And then through Indeed and Zip Recruiter have you</p> <p>9 applied for jobs?</p> <p>10 A. Yes.</p> <p>11 Q. And what jobs are those?</p> <p>12 A. It would go in administration for, you know, office</p> <p>13 assistant and things like that.</p> <p>14 Q. How far have those applications gone?</p> <p>15 A. I've not gotten interviews.</p> <p>16 Q. Who have you spoken to about this lawsuit other than</p> <p>17 your attorneys and husband?</p> <p>18 A. No one.</p> <p>19 Q. Have you spoken to anyone in Beaumont about this</p> <p>20 lawsuit?</p> <p>21 A. No.</p> <p>22 Q. Have you asked anyone to be a witness for you?</p> <p>23 A. No.</p> <p>24 Q. All right. Pulling up another document.</p> <p>25 It's easier when it involves hard copies I</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 Q. And where have you looked?</p> <p>3 A. I've gone on Henry Ford. I have looked through</p> <p>4 Beaumont also just to transfer out of that department,</p> <p>5 and I also have gone on Indeed and -- Henry Ford,</p> <p>6 Indeed, Zip Recruiter.</p> <p>7 Q. Have you applied for any positions at Henry Ford?</p> <p>8 A. Yes.</p> <p>9 Q. And what positions are those?</p> <p>10 A. Administration.</p> <p>11 Q. How far did that application go?</p> <p>12 A. It never got nowhere. I never got no interviews.</p> <p>13 Q. Were you ever provided a reason why?</p> <p>14 A. No.</p> <p>15 Q. And you mentioned Beaumont as well, trying to go to a</p> <p>16 different -- is it department or area?</p> <p>17 A. Yes. I --</p> <p>18 Q. Where have you --</p> <p>19 A. Sorry.</p> <p>20 Q. No, it's okay.</p> <p>21 Where have you applied within Beaumont?</p> <p>22 A. I applied for the Breast Care Center. I've applied</p> <p>23 for doctor offices. I applied for a orthopedic doctor</p> <p>24 in Taylor. I have a list of them that I sent you.</p> <p>25 Q. And what has happened with those applications?</p>	<p style="text-align: right;">Page 25</p> <p>1 find.</p> <p>2 All right. I'm going to share my screen</p> <p>3 again. And, Miss Miller, I don't know if you have a</p> <p>4 computer in front of you where you can pull up the</p> <p>5 documents I sent, but I am -- if it's easier for you</p> <p>6 to do that than to see the shared screen, I am pulling</p> <p>7 up the Complaint, which is Number 2.</p> <p>8 A. So what? I go to my e-mail?</p> <p>9 Q. It's up -- I mean, I'm going to share my screen. It's</p> <p>10 just whatever's easier for you.</p> <p>11 A. Oh.</p> <p>12 Q. If you want to pull it up or just look at my screen</p> <p>13 that I'm sharing.</p> <p>14 A. I'll look at the screen.</p> <p>15 Q. Okay. Here we go.</p> <p>16 All right. Are you able to see that okay?</p> <p>17 A. Yes.</p> <p>18 Q. All right. All right. I'm going to go through to</p> <p>19 your claims here, and I'm scrolling through.</p> <p>20 And I'd like to mark this as Exhibit Number</p> <p>21 1.</p> <p>22 DEPOSITION EXHIBIT NUMBER 1</p> <p>23 WAS MARKED BY THE REPORTER</p> <p>24 FOR IDENTIFICATION</p> <p>25 BY MS. VAN DYKE:</p>

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<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. Part of your claims is that you suffer from --</p> <p>2 is it asthma and COPD?</p> <p>3 A. Yes.</p> <p>4 Q. When were you first diagnosed -- we'll take each one</p> <p>5 separately, but when were you first diagnosed with</p> <p>6 asthma?</p> <p>7 A. When I was six years old.</p> <p>8 Q. Have you been treating with a doctor for your asthma</p> <p>9 since six on?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Who is your current doctor you treat with for</p> <p>12 your asthma?</p> <p>13 A. Dr. Srinivas Gatla, the doctor right now. Prior to</p> <p>14 him was Dr. Vijay Khanna. He was a pulmonary</p> <p>15 specialist, but he sold his practice to this</p> <p>16 Dr. Gatla.</p> <p>17 Q. Got it. And I'll help spell it here. It looks like</p> <p>18 it's S-r-i-n-i-v-a-s, Gatla, G-a-t-l-a.</p> <p>19 A. Sounds about right.</p> <p>20 Q. Okay. And so is he a pulmonary specialist or a</p> <p>21 pulmonologist or is he like an internist, if you know?</p> <p>22 A. He's an M.D.</p> <p>23 Q. Okay.</p> <p>24 A. I'm trying --</p> <p>25 Q. And before you saw Dr. Gatla, who was the doctor you</p>	<p style="text-align: right;">Page 28</p> <p>1 weeks. Oh, and prednisone, 5 milligrams. I have a</p> <p>2 list.</p> <p>3 Q. When were you diagnosed with the COPD?</p> <p>4 A. About -- with Dr. Khanna in -- maybe seven or ten</p> <p>5 years ago.</p> <p>6 Q. Were you ever provided a reason why they think you</p> <p>7 developed COPD?</p> <p>8 A. Because I've had so many attacks, it's causing scar</p> <p>9 tissue.</p> <p>10 Q. How many times -- or let me strike that.</p> <p>11 Have you been hospitalized for your asthma?</p> <p>12 A. Yes.</p> <p>13 Q. How many times?</p> <p>14 A. I don't know how many times. It's been so often.</p> <p>15 Q. In the last two years have you been hospitalized for</p> <p>16 your asthma?</p> <p>17 A. No.</p> <p>18 Q. When was the last time you were hospitalized for your</p> <p>19 asthma?</p> <p>20 A. Maybe 2014 or '15. I'm not exact. I don't know the</p> <p>21 exact date.</p> <p>22 Q. Which hospital were you in?</p> <p>23 A. Beaumont Taylor. It was bef- -- it was -- I think it</p> <p>24 was Oakwood at that time. I'm not sure.</p> <p>25 Q. All right. I want to discuss your medication for a</p>
<p style="text-align: right;">Page 27</p> <p>1 just named?</p> <p>2 A. Vijay, V-i-j-a-y, Khanna, K-h-a-n-n-a.</p> <p>3 Q. All right. And he was a pulmonary specialist you</p> <p>4 said?</p> <p>5 A. Yes. He was in charge of the whole Trenton and Taylor</p> <p>6 hospital for pulmonary diseases.</p> <p>7 Q. And you said he sold his practice?</p> <p>8 A. Yes.</p> <p>9 Q. Before you saw him, are there other people you recall</p> <p>10 treating with for your asthma?</p> <p>11 A. I tried to see somebody else after Dr. Gatla. I don't</p> <p>12 remember her name. Only went a couple times.</p> <p>13 Q. Is that currently?</p> <p>14 A. It was within the last year.</p> <p>15 Q. All right. Is she --</p> <p>16 What's her specialty?</p> <p>17 A. She's a pulmonary specialist.</p> <p>18 Q. All right. Is this within Beaumont?</p> <p>19 A. Yes.</p> <p>20 Q. What medications are you currently on for your asthma?</p> <p>21 A. Albuterol rescue inhaler, albuterol nebulizer</p> <p>22 solution, 2.5 over something. That's for the</p> <p>23 nebulizer. I am on Advair 550, Spiriva, another</p> <p>24 inhaler. I am on Zyrtec-D for the allergies, to</p> <p>25 control it. I am on Xolair injections every two</p>	<p style="text-align: right;">Page 29</p> <p>1 little bit.</p> <p>2 For the Albuterol inhaler, your emergency</p> <p>3 inhaler --</p> <p>4 A. Um-hum.</p> <p>5 Q. -- how -- when's the last time you used it?</p> <p>6 A. This morning.</p> <p>7 Q. How often do you have to use your emergency inhaler?</p> <p>8 A. I do two puffs every -- every four hours. I use 12</p> <p>9 puffs a day.</p> <p>10 Q. And the medication you identified for us, is that also</p> <p>11 to treat the COPD?</p> <p>12 A. All the other ones?</p> <p>13 Q. Yes.</p> <p>14 A. Yes.</p> <p>15 Q. Have you al- --</p> <p>16 How long have you been on 12 puffs a day for</p> <p>17 the albuterol?</p> <p>18 A. It started with Dr. Khanna. I'm thinking five years.</p> <p>19 I don't know the exact date.</p> <p>20 Q. Have you gone to an allergist?</p> <p>21 A. Years ago.</p> <p>22 Q. Who was that allergist?</p> <p>23 A. I don't know. My mother took me.</p> <p>24 Q. Oh. So about --</p> <p>25 A. I was a child.</p>

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<p style="text-align: right;">Page 30</p> <p>1 Q. Okay. All right. Do you have seasonal allergies, pet 2 allergies? 3 A. I have seasonal and I have some allergies to cats and 4 other -- like horses and stuff. 5 Q. Do you own any cats? 6 A. No. 7 Q. All right. In terms of the seasonal allergies, do you 8 know exactly what you're allergic to? 9 A. Grass, hay. Cut grass, hay, change of seasons, 10 pollen, all that. 11 Q. Mold? 12 A. Yes. 13 Q. What about trees? 14 A. I -- I'm not sure, but if it's got pollen, it would 15 be. 16 Q. Do you find your allergies are worse during certain 17 times of the year? 18 A. Yes. 19 Q. When would that be? 20 A. It would be in the spring. 21 Q. How's fall? 22 A. It comes and goes. 23 Q. When's the last time you used your nebulizer? 24 A. Yesterday. 25 Q. How often do you use your nebulizer?</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Are you on it once a day? 2 A. It depends on the season. I usually take it once a 3 day, but there's times I have to take it twice a day. 4 Q. Okay. And then the last one you identified was -- is 5 it Xolair injections? 6 A. Yes. Two shots, 150 milligrams, every two weeks. 7 Q. Did we cover all of the medication you're on for your 8 asthma? 9 A. For asthma? 10 Q. For asthma, yeah. Asthma and COPD. 11 A. Yes. 12 Q. All right. Okay. Going back to Exhibit -- 13 Sorry. Go ahead. 14 A. Excuse me. I am also on prednisone, 5 milligrams, 15 twice a day. 16 Q. How long have you been on the prednisone for? 17 A. Years. 18 Q. Daily? 19 A. Yes. 20 Q. Have you had COVID-19 yet? 21 A. Yes. 22 Q. When did you have it? 23 A. December. I think my paperwork said -- it was -- it 24 was December 10th, 2020, to -- the ten-day -- I think 25 it was like the 21st, something like that.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Two to three times a day. 2 Q. Do you use it as needed? 3 A. The doctor wants me to use it three times a day, but I 4 don't have time at work to stop and do a treatment all 5 the time. 6 Q. When do you typically do your nebulizer treatment? 7 A. Before I go to work and when I come home before bed. 8 Q. How long have you been doing that for? 9 A. God, I don't know. At least ten years maybe. 10 Q. So you're on -- 11 How often do you take Advair? 12 A. Every day, twice a day. 13 Q. Is it once in the morning and once at night? 14 A. Yes. 15 Q. How long have you been on Advair for? 16 A. I don't remember. 17 Q. And also with the Spiriva, what about that? 18 A. They gave that to me in the last four or five years. 19 Q. How often do you take that? 20 A. Twice a day. 21 Q. Okay. Do you take it morning and night as well? 22 A. Yes. 23 Q. All right. And then Zyrtec-D, how long have you been 24 on that for? 25 A. A long time.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. And do you know how you contracted it? 2 A. No. I work in a hospital. 3 Q. Were you out for those -- I'm trying to do the math -- 4 ten to 11 days only for it? 5 A. Yes. 6 Q. And did you -- 7 Were any of your medications that you listed 8 for the asthma or COPD, were they changed during this 9 time? 10 A. No. 11 Q. How was your asthma while you had the COVID-19? 12 A. I had a lot of shortness of breath and, of course, 13 stuffiness, headache, nausea, but the asthma, I -- I 14 controlled it as best I could to stay out of the 15 hospital. 16 Q. Yeah. I was just going to ask you that, too. Were 17 you hospitalized at all for it? 18 A. No. 19 Q. Did you have to see a doctor for it? 20 A. I had to see him on that video chat stuff. It was 21 Dr. Khanna. 22 Q. And what did he tell you to do while you had COVID-19? 23 A. I don't think he did a video chat. I think he just 24 called me. Sorry about that. 25 Q. That's okay.</p>

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<p style="text-align: right;">Page 34</p> <p>1 What did he tell you?</p> <p>2 A. He told me to increase my nebulizer if needed.</p> <p>3 Q. Did you have to increase it?</p> <p>4 A. I did do it four times a day a couple days.</p> <p>5 Q. Did you have any residual issues from the COVID-19?</p> <p>6 A. I've been having problems with breathing ever since a</p> <p>7 little bit more, but I'm controlling it the best I</p> <p>8 can.</p> <p>9 Q. To your knowledge have you had COVID-19 again after</p> <p>10 this episode?</p> <p>11 A. No.</p> <p>12 Q. Okay. I'm going to run through --</p> <p>13 I'm going back to this exhibit here where I'm</p> <p>14 sharing the screen. Going to your claims.</p> <p>15 Okay. So the first claim you've brought is</p> <p>16 failure to accommodate. And are you alleging that</p> <p>17 Beaumont failed to accommodate your asthma and COPD?</p> <p>18 A. Yes.</p> <p>19 Q. All right. Anything else in terms of your alleged</p> <p>20 disability?</p> <p>21 MR. SHEAROUSE: I'm going to object. It</p> <p>22 calls for a legal conclusion. Go ahead.</p> <p>23 BY MS. VAN DYKE:</p> <p>24 Q. Sorry. Any other medical condition other than the</p> <p>25 asthma or COPD that they have failed to accommodate?</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Beth Karr.</p> <p>2 Q. And you said Beth was out?</p> <p>3 A. Yes. She was out on medical leave.</p> <p>4 Q. Do you know why she was out on medical leave?</p> <p>5 A. Something about her foot.</p> <p>6 Q. All right. And when did you ask to wear the N-95</p> <p>7 mask?</p> <p>8 A. The day I received an e-mail from her stating nobody</p> <p>9 was allowed to use one.</p> <p>10 Q. What date was that?</p> <p>11 A. It was in March in 2020. I don't know the exact date.</p> <p>12 Q. Were you currently working then?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know if other people had asked to wear an N-95</p> <p>15 mask?</p> <p>16 A. Yes.</p> <p>17 Q. Who else?</p> <p>18 A. Adriana.</p> <p>19 Q. What's her last name, if you know?</p> <p>20 A. Shelley.</p> <p>21 Q. Shelley?</p> <p>22 A. Um-hum.</p> <p>23 Q. And how do you know she asked for one?</p> <p>24 A. She told me, too.</p> <p>25 Q. Anyone else?</p>
<p style="text-align: right;">Page 35</p> <p>1 A. I don't understand the question.</p> <p>2 Q. All right. It's -- you're saying that they failed to</p> <p>3 accommodate you in terms of dealing with your asthma</p> <p>4 and COPD.</p> <p>5 A. Yes.</p> <p>6 Q. Any other medical condition involved in that, too,</p> <p>7 that you're alleging that Beaumont failed to</p> <p>8 accommodate with you?</p> <p>9 MR. SHEAROUSE: Same objection.</p> <p>10 Go ahead and answer.</p> <p>11 A. Not that I'm aware of.</p> <p>12 BY MS. VAN DYKE:</p> <p>13 Q. Okay. How did Beaumont fail to accommodate you --</p> <p>14 A. It was just let me have a N-95 mask during the</p> <p>15 pandemic with my underlying condition.</p> <p>16 Q. Did you ask to wear one?</p> <p>17 A. Yes.</p> <p>18 Q. All right. Who did you ask?</p> <p>19 A. Roseanne Linsowe.</p> <p>20 Q. And is that Rosanna Von Linsowe?</p> <p>21 A. Yeah. I'm sorry. Yes.</p> <p>22 Q. And who is Rosanna?</p> <p>23 A. At the time she was our manager -- or supervisor. She</p> <p>24 was supervisor. Sorry. The manager was out.</p> <p>25 Q. Who was the manager?</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Not that I know of.</p> <p>2 Q. Was Adriana allowed to wear an N-95 mask?</p> <p>3 A. No.</p> <p>4 Q. In terms of your department, was anyone allowed to</p> <p>5 wear an N-95 mask?</p> <p>6 A. No.</p> <p>7 Q. Do you know of anyone who went out on medical leave</p> <p>8 during this time period?</p> <p>9 A. Me.</p> <p>10 Q. When did you go on leave?</p> <p>11 A. I do believe it was March 25th and 26th of 2020,</p> <p>12 around that time.</p> <p>13 Q. I'm backing up for a second.</p> <p>14 Did you have -- yeah. So you had -- you had</p> <p>15 COVID before March of this time?</p> <p>16 A. No.</p> <p>17 Q. No? Okay. So --</p> <p>18 I think you said you had it December 10th,</p> <p>19 2020. Would it be December 10, 2021?</p> <p>20 A. It could be.</p> <p>21 Q. Oh, I'm sorry. December -- no, December 2020. So it</p> <p>22 was the December after that March.</p> <p>23 A. Yes. I'm sorry.</p> <p>24 Q. Okay. Yeah. No, no, no. I'm just making sure.</p> <p>25 A. Because I came back in July. I came back in July of</p>

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<p style="text-align: right;">Page 38</p> <p>1 2020, so I was working.</p> <p>2 Q. All right. When did you come back in July?</p> <p>3 A. July 6th.</p> <p>4 Q. And what was the reason for that leave?</p> <p>5 A. Because Beaumont and Roseanne refused to let me have a</p> <p>6 N-95 and my doctors, even with a letter, stating it</p> <p>7 was unsafe for me to be there with the pandemic at</p> <p>8 that time because nobody knew about it.</p> <p>9 Q. Do you know of other people who had to go on leave as</p> <p>10 well?</p> <p>11 A. No.</p> <p>12 Q. Do you know of anyone who quit working altogether</p> <p>13 during this?</p> <p>14 A. Yes.</p> <p>15 Q. And who's that?</p> <p>16 A. Adriana.</p> <p>17 Q. So she quit?</p> <p>18 A. She quit because they refused to let her have an N-95.</p> <p>19 Q. If you know, do you know what medical issues she</p> <p>20 suffered from?</p> <p>21 A. She has -- she was asthmatic.</p> <p>22 Q. Anything else?</p> <p>23 A. I don't know. I don't know.</p> <p>24 Q. At this time in March when you asked to wear the N-95</p> <p>25 mask, did you have your own?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. He has an account, I think.</p> <p>2 Q. Okay. So when you make purchases on Amazon, is it</p> <p>3 under your account or his account?</p> <p>4 A. Sometimes it's under my account. Sometimes I have my</p> <p>5 kids order stuff.</p> <p>6 Q. Do you recall who ordered the N-95 masks for you?</p> <p>7 A. I don't remember.</p> <p>8 Q. When did you purchase the N-95 masks?</p> <p>9 A. It would have been for the -- before -- before March</p> <p>10 when it first came out, when I first heard about it</p> <p>11 after Roseanne said I was not allowed to have one.</p> <p>12 Q. Did she explain why you were not allowed to have one?</p> <p>13 A. It was Beaumont's policy and a paper mask was good</p> <p>14 enough.</p> <p>15 Q. Did she explain why it was Beaumont's policy?</p> <p>16 A. No. That's all she said.</p> <p>17 Q. At the time were only like frontline workers allowed</p> <p>18 to wear the N-95 mask, if you know?</p> <p>19 MR. SHEAROUSE: Objection, form, foundation.</p> <p>20 Go ahead and answer.</p> <p>21 A. They said only frontline people were allowed to wear</p> <p>22 the N-95, the doctors and nurses.</p> <p>23 BY MS. VAN DYKE:</p> <p>24 Q. Do you know if the hospital had a mask shortage at the</p> <p>25 time?</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Yes.</p> <p>2 Q. And how --</p> <p>3 When did you get that N-95 mask?</p> <p>4 A. I had bought some online and I also -- my husband</p> <p>5 brought a lot of them from his job. His job required</p> <p>6 everybody to wear an N-95 at his -- at the factory, so</p> <p>7 he brought some home.</p> <p>8 Q. What factory is he at?</p> <p>9 A. Why does it matter?</p> <p>10 Q. I'm asking. What type of job does he do?</p> <p>11 A. He's a machinist.</p> <p>12 Q. Who does he work for?</p> <p>13 A. USG.</p> <p>14 Q. Did he --</p> <p>15 Was it part of his regular job to wear the</p> <p>16 N-95 mask even before the pandemic?</p> <p>17 A. No.</p> <p>18 Q. Where did you purchase the N-95 masks online?</p> <p>19 A. Amazon.</p> <p>20 Q. And is that under your account?</p> <p>21 A. No.</p> <p>22 Q. Whose account is it under that you purchased?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Would it be --</p> <p>25 Does your husband have an account?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. No.</p> <p>2 Q. Like, no, you don't know, or, no, they didn't have a</p> <p>3 shortage?</p> <p>4 A. They did not. She had -- Roseanne had them in the</p> <p>5 office.</p> <p>6 Q. Roseanne -- Rosanna had what in the office?</p> <p>7 A. She had N-95s.</p> <p>8 Q. Did she wear one herself?</p> <p>9 A. No.</p> <p>10 Q. How do you know she had N-95s in the office?</p> <p>11 A. She gave them to us.</p> <p>12 Q. When did she give them to you?</p> <p>13 A. She gave them to us when --</p> <p>14 She got a few. She gave them to us when it</p> <p>15 first started, and then -- and then she took them</p> <p>16 away.</p> <p>17 Q. What type of mask were you wearing at work when this</p> <p>18 first started?</p> <p>19 A. A N-95.</p> <p>20 Q. Okay. And then after she took them away, what type of</p> <p>21 mask were you wearing?</p> <p>22 A. I had to go on medical leave.</p> <p>23 Q. When you came off your medical leave, what type of</p> <p>24 mask were you wearing?</p> <p>25 A. A N-95.</p>

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<p style="text-align: right;">Page 42</p> <p>1 Q. In July?</p> <p>2 A. Yes.</p> <p>3 Q. What type of mask do you currently wear?</p> <p>4 A. I wear an N-95 and a paper.</p> <p>5 Q. Do you double mask?</p> <p>6 A. Sometimes.</p> <p>7 Q. Okay. Oh. Is it N-95 or a paper or double? If that</p> <p>8 makes sense.</p> <p>9 A. I've done -- I've done double and I've done some</p> <p>10 without since the COVID is gone.</p> <p>11 Q. Did --</p> <p>12 At the time you went on medical leave in</p> <p>13 March of 2020, did you consider doubling up a paper</p> <p>14 mask?</p> <p>15 A. No.</p> <p>16 Q. Why not?</p> <p>17 A. It wouldn't protect me.</p> <p>18 Q. When you came back from leave in July of 2020, do you</p> <p>19 know why you were allowed to wear an N-95 mask then?</p> <p>20 A. I assumed they changed the rules.</p> <p>21 Q. Did you ever talk to Roseanne about it?</p> <p>22 A. No.</p> <p>23 Q. Did you ever --</p> <p>24 Did you ask anyone if you could specifically</p> <p>25 wear that mask?</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. I'm asking because we've looked through our e-mails we</p> <p>2 have here and I don't recall seeing this one.</p> <p>3 A. I sent it to my lawyer's office a few times.</p> <p>4 Q. Yeah. We'll double-check, but I'm wondering which</p> <p>5 e-mail it is.</p> <p>6 A. Hang on. So many pops-up showing up with this stupid</p> <p>7 thing.</p> <p>8 MR. SHEAROUSE: Katie, I found it in our</p> <p>9 records if you would like me to send that over to you.</p> <p>10 MS. VAN DYKE: That would be helpful. Yeah.</p> <p>11 MR. SHEAROUSE: Yes.</p> <p>12 THE WITNESS: Thank you.</p> <p>13 MR. SHEAROUSE: Give me one moment.</p> <p>14 MS. VAN DYKE: Okay. If you want to just</p> <p>15 e-mail it to me, I can pull it up and look at it.</p> <p>16 MR. SHEAROUSE: Yeah. You got it.</p> <p>17 THE WITNESS: My computer is asking for a</p> <p>18 bunch of pop-ups. Sorry. I don't know how to make</p> <p>19 them stop.</p> <p>20 MS. VAN DYKE: Yeah. This whole digital</p> <p>21 thing makes it kind of convenient and kind of not</p> <p>22 convenient at the same time.</p> <p>23 MR. SHEAROUSE: What's your e-mail?</p> <p>24 MS. VAN DYKE: It's so long. It's</p> <p>25 katherine.vandyke@jacksonlewis.com. I can spell it</p>
<p style="text-align: right;">Page 43</p> <p>1 A. After I came back?</p> <p>2 Q. Yes.</p> <p>3 A. No.</p> <p>4 Q. Were there other people in the department also wearing</p> <p>5 that mask then?</p> <p>6 A. Some will -- were.</p> <p>7 Q. All right.</p> <p>8 MS. VAN DYKE: If you don't mind, could we</p> <p>9 take a short break at this time? Is that okay?</p> <p>10 THE WITNESS: Yeah.</p> <p>11 MS. VAN DYKE: All right. I just need like</p> <p>12 five minutes.</p> <p>13 MR. SHEAROUSE: Okay.</p> <p>14 MS. VAN DYKE: All right. Thanks.</p> <p>15 (Recess taken at 10:41 a.m.)</p> <p>16 (Back on the record at 10:54 a.m.)</p> <p>17 BY MS. VAN DYKE:</p> <p>18 Q. All right. Miss Miller, you mentioned that there was</p> <p>19 an e-mail from Rosanna about how no one could wear the</p> <p>20 N-95 mask.</p> <p>21 A. Yes.</p> <p>22 Q. Do you have that e-mail?</p> <p>23 A. I do.</p> <p>24 Q. When's it from, what date?</p> <p>25 A. I don't know. I'd have to go through my paperwork.</p>	<p style="text-align: right;">Page 45</p> <p>1 out to you. It's k-a-t-h-e-r-i-n-e.vandyke,</p> <p>2 v-a-n-d-y-k-e@jackson, j-a-c-k-s-o-n, lewis,</p> <p>3 l-e-w-i-s, .com. It's like the longest e-mail address</p> <p>4 known to man. So --</p> <p>5 MR. SHEAROUSE: And I feel that with my --</p> <p>6 with my last name as well, so I get it.</p> <p>7 BY MS. VAN DYKE:</p> <p>8 Q. While I wait for that to come over, Miss Miller, when</p> <p>9 you received that e-mail, did you have the</p> <p>10 conversation then with Rosanna after that e-mail came</p> <p>11 out?</p> <p>12 A. Yes. I confronted her.</p> <p>13 Q. That same day?</p> <p>14 A. Yes.</p> <p>15 Q. And --</p> <p>16 A. It was either that same -- it was either the same day</p> <p>17 or the next day I was working I'd seen it.</p> <p>18 Q. Did you go to her office?</p> <p>19 A. No. We were out in the lobby. Well, it's all</p> <p>20 connected. It's a --</p> <p>21 Q. In the lobby --</p> <p>22 A. It's where everybody is -- goes.</p> <p>23 Q. Okay.</p> <p>24 A. It's like a lunchroom thing.</p> <p>25 Q. Was anyone else there for that conversation?</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. Yeah. Everybody could hear.</p> <p>2 Q. And everyone like the people who were working that</p> <p>3 day?</p> <p>4 A. Yes.</p> <p>5 Q. And what did you say to her?</p> <p>6 A. I told her that I needed a N-95 mask because I have</p> <p>7 asthma and COPD, and she stated that I could not wear</p> <p>8 it because nurses and doctors were getting mad that I</p> <p>9 had one and they did not.</p> <p>10 Q. Did she mention anything about a shortage?</p> <p>11 A. No.</p> <p>12 Q. What was your response to her after she said that?</p> <p>13 A. I told her that I brought in my own N-95 mask, so I do</p> <p>14 not understand what the problem is and that she -- I</p> <p>15 have -- I have asthma and COPD and my life is just as</p> <p>16 important as anybody else's.</p> <p>17 Q. What was her response to that?</p> <p>18 A. She says you are not allowed to wear it per Beaumont</p> <p>19 rules.</p> <p>20 Q. How many N-95 masks did you have?</p> <p>21 A. Now?</p> <p>22 Q. No. I mean at the time of your conversation with her.</p> <p>23 A. On me at that time, probably three or four on me, but</p> <p>24 like I said, my husband was getting most of them after</p> <p>25 that.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Does she still go by Miller?</p> <p>2 A. Miller-Griffin.</p> <p>3 Q. Griffin? Okay.</p> <p>4 A. It's Miller-Griffin. It's actually hyphenated.</p> <p>5 Q. Okay. And what are their addresses? Go one by one.</p> <p>6 (Telephone interruption.)</p> <p>7 A. Hang on a minute. I'm sorry. Can I take one second,</p> <p>8 please?</p> <p>9 Q. Yeah. Absolutely.</p> <p>10 (Recess taken at 11:01 a.m.)</p> <p>11 (Back on the record at 11:02 a.m.)</p> <p>12 BY MS. VAN DYKE:</p> <p>13 Q. I do have to ask. Is there anyone in the room with</p> <p>14 you right now?</p> <p>15 A. There's my daughter. She's coming in and out of the</p> <p>16 house.</p> <p>17 Q. And which daughter is that?</p> <p>18 A. Mary.</p> <p>19 Q. Mary?</p> <p>20 Do one of your children work for Beaumont?</p> <p>21 A. Yes.</p> <p>22 Q. Which one is that?</p> <p>23 A. Mary.</p> <p>24 Q. Mary?</p> <p>25 All right. So let's start with Jessica.</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. In terms of the N-95 masks, do you use them one time,</p> <p>2 like once a day? How often would you have to change</p> <p>3 them?</p> <p>4 A. Every day.</p> <p>5 Q. Every day?</p> <p>6 Do you know how your husband was getting</p> <p>7 extra masks?</p> <p>8 A. His employer said it was okay for him to bring extra</p> <p>9 home so other people would not spread the virus.</p> <p>10 Q. And who is his employer?</p> <p>11 A. USG.</p> <p>12 Q. All right. Sorry. You said that.</p> <p>13 In terms of the purchase of the masks on</p> <p>14 Amazon, which children's accounts have you used on</p> <p>15 Amazon?</p> <p>16 A. I don't remember.</p> <p>17 Q. Do you use all three of their accounts at times or</p> <p>18 they buy you things for like --</p> <p>19 A. They buy me things here now.</p> <p>20 Q. All right. And you did provide their first names, but</p> <p>21 let's run through.</p> <p>22 Can you please provide your children's full</p> <p>23 names?</p> <p>24 A. Mary Mill- -- well, Jessica Miller, Matthew Miller,</p> <p>25 Jr., and Mary Miller, and she just got married.</p>	<p style="text-align: right;">Page 49</p> <p>1 What is her address?</p> <p>2 A. Why?</p> <p>3 Q. Because I am going to ask for the online records of</p> <p>4 the N-95 mask purchase, and if it turns out it's under</p> <p>5 one of your children's accounts, we will have -- we're</p> <p>6 going to subpoena your children to get those records,</p> <p>7 the Amazon records of the purchase.</p> <p>8 So what is your daughter Jessica's address?</p> <p>9 A. 7128 Elm Street in Taylor, Michigan, 48180.</p> <p>10 Q. Okay. And then Mary?</p> <p>11 A. At that time she was living at my house. Right now I</p> <p>12 don't know her exact address. It's 81 something.</p> <p>13 Q. Okay. What city is she in?</p> <p>14 A. She's in Taylor also.</p> <p>15 Q. Okay. And then your son, what's his address?</p> <p>16 A. Same as Jessica's, but he -- he wouldn't have done it.</p> <p>17 He doesn't -- I don't do anything with him, with his</p> <p>18 Amazon.</p> <p>19 Q. Okay. So it was either Jessica or Mary.</p> <p>20 A. It could have been.</p> <p>21 Q. Okay. Or -- or you or your husband.</p> <p>22 A. Or my -- I don't remember.</p> <p>23 Q. Okay. All right. When you came back to work in July,</p> <p>24 where were you able to obtain the N-95 masks from?</p> <p>25 A. My husband and the store. I do not have receipts.</p>

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<p style="text-align: right;">Page 50</p> <p>1 Q. Okay. When you --</p> <p>2 Did you wear an N-95 mask that entire year</p> <p>3 for the rest of 2020?</p> <p>4 A. Yes, and into 2021.</p> <p>5 Q. Okay. Do you recall when the first time is that you</p> <p>6 wore like a regular paper mask?</p> <p>7 A. I don't remember it. Probably this -- I'm sorry.</p> <p>8 Going back and forth. This year.</p> <p>9 Q. During --</p> <p>10 When you came back to work in 2020, was</p> <p>11 Beaumont supplying masks at all?</p> <p>12 A. They were supplying the paper ones, and I don't know</p> <p>13 if they were supplying the N-95s at that time when I</p> <p>14 first came back or not, but I know other people had</p> <p>15 them.</p> <p>16 Q. At some point do you recall Beaumont supplying N-95</p> <p>17 masks to your group or offering them?</p> <p>18 A. Yes.</p> <p>19 Q. When was that?</p> <p>20 A. I don't -- I don't remember. I'm trying to think.</p> <p>21 When did they start giving us the N-95?</p> <p>22 Q. Yes, or offering them up.</p> <p>23 A. After -- after Roseanne sent out an e-mail, I think.</p> <p>24 I don't know if she sent an e-mail or -- I don't know</p> <p>25 the exact date or month.</p>	<p style="text-align: right;">Page 52</p> <p>1 You can answer.</p> <p>2 A. It was about my asthma.</p> <p>3 BY MS. VAN DYKE:</p> <p>4 Q. Okay. After Rosanna or Roseanne said no N-95 mask,</p> <p>5 did you go to HR?</p> <p>6 A. Did I go to a chart?</p> <p>7 Q. Sorry. Did you -- no. Did you --</p> <p>8 After she told you N-95 -- or no N-95, did</p> <p>9 you complain to Human Resources?</p> <p>10 A. I complained to the union steward. I'm in a union.</p> <p>11 Q. All right. And who is that?</p> <p>12 A. Geri Souve.</p> <p>13 Q. Could you spell the last name for me?</p> <p>14 A. S-o-u-v-e.</p> <p>15 Q. All right. And what did Geri say?</p> <p>16 A. She didn't say -- she never responded.</p> <p>17 Q. Did --</p> <p>18 All right. So let me backtrack here.</p> <p>19 Did you send an e-mail complaint?</p> <p>20 A. I sent a e-mail complaint.</p> <p>21 Q. Okay. Did you ever discuss this with Geri?</p> <p>22 A. I don't remember.</p> <p>23 Q. Did --</p> <p>24 And you said Geri never responded to your</p> <p>25 e-mail?</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. Okay. When you saw your doctor in March of 2020 -- or</p> <p>2 I believe you said you may have had a telephone call</p> <p>3 with him.</p> <p>4 A. Yes.</p> <p>5 Q. What did he say exactly about you working in the</p> <p>6 hospital during the pandemic?</p> <p>7 A. He said that if I was not able to wear a N-95 mask, it</p> <p>8 was not safe for me to be there with my asthma and</p> <p>9 COPD.</p> <p>10 Q. Did he ever say it was still unsafe for you to be</p> <p>11 there even with an N-95 mask?</p> <p>12 A. I don't know -- I don't remember what he documented.</p> <p>13 Q. And this is Dr. --</p> <p>14 A. Khanna.</p> <p>15 Q. Okay. Oh, it was Khanna at the time.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. All right. All right. So hold on. Let me</p> <p>18 share my screen again here. See if I can do this</p> <p>19 faster than before.</p> <p>20 Okay. All right. So for your failure to</p> <p>21 accommodate claim, is this about the N-95 mask?</p> <p>22 A. Yes.</p> <p>23 Q. Is it about anything else?</p> <p>24 MR. SHEAROUSE: Objection, calls for a legal</p> <p>25 conclusion.</p>	<p style="text-align: right;">Page 53</p> <p>1 A. I don't remember if she responded at that time or not.</p> <p>2 Q. Did you make any complaints to Human Resources?</p> <p>3 A. About the N-95?</p> <p>4 Q. Yes.</p> <p>5 A. I may have. I have -- I would have to look at my</p> <p>6 paperwork. I don't remember. Oh. Yeah, I -- yeah,</p> <p>7 I'd have to look.</p> <p>8 Q. Did you have any in-person conversations with a Human</p> <p>9 Resources representative about the N-95?</p> <p>10 A. I don't remember.</p> <p>11 Q. Did you complain to anyone else about the N-95 other</p> <p>12 than Geri and Miss Von Linsowe?</p> <p>13 A. Yes.</p> <p>14 Q. Who?</p> <p>15 A. The staff.</p> <p>16 Q. Your co-workers?</p> <p>17 A. Co-workers. It was not right, and they agreed.</p> <p>18 Q. All right. I'm scrolling down to your next claim</p> <p>19 here, and it's the same, it's the failure to</p> <p>20 accommodate, and this is under Michigan law, but does</p> <p>21 this also involve just the N-95 mask?</p> <p>22 MR. SHEAROUSE: I'm going to object to legal</p> <p>23 conclusion.</p> <p>24 Can I just have a standing objection on</p> <p>25 anything that relates to the basis for claims?</p>

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<p style="text-align: right;">Page 54</p> <p>1 MS. VAN DYKE: Absolutely.</p> <p>2 MR. SHEAROUSE: There you go. That way it</p> <p>3 keeps it from -- thanks.</p> <p>4 MS. VAN DYKE: That's fine.</p> <p>5 MR. SHEAROUSE: Go ahead and answer.</p> <p>6 A. I'm not sure if it does or doesn't. It should.</p> <p>7 BY MS. VAN DYKE:</p> <p>8 Q. Okay. Let's go down.</p> <p>9 Okay. One of the things you're claiming is</p> <p>10 that Beaumont interfered with your FMLA leave.</p> <p>11 How did Beaumont interfere with your leave?</p> <p>12 A. I'm trying to --</p> <p>13 There's been multiple times. I know that I</p> <p>14 have had issues with managers not -- arguing with me</p> <p>15 if I was using my FMLA right.</p> <p>16 Q. And what is that? What happened?</p> <p>17 A. I got -- I had contacted HR.</p> <p>18 Q. When is this?</p> <p>19 A. Was with Renee.</p> <p>20 Q. And when was this?</p> <p>21 A. Supervisor, and I don't -- I don't exactly remember.</p> <p>22 It was around last year sometime.</p> <p>23 Q. And your -- this is your supervisor, your current</p> <p>24 supervisor?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. They ended up giving me one for arthritis, too. I</p> <p>2 don't know how FMLA people did that, but -- so it was</p> <p>3 for three. Excuse me.</p> <p>4 Q. All right. So the FMLA leave for your asthma, was</p> <p>5 that intermittent leave?</p> <p>6 A. Yes.</p> <p>7 Q. How often were you allowed to call off?</p> <p>8 A. I think it's two to three times a month.</p> <p>9 Q. And the one for your husband, was that for a set</p> <p>10 period or was it also intermittent?</p> <p>11 A. Yes.</p> <p>12 Q. A set period?</p> <p>13 A. It was for -- I think it was intermediate. I'd have</p> <p>14 to look.</p> <p>15 MS. VAN DYKE: And you know what? While Miss</p> <p>16 Miller looks, if we could take a short break, Austen,</p> <p>17 that would be helpful because I want to take a quick</p> <p>18 look at the e-mail you sent over.</p> <p>19 MR. SHEAROUSE: Okay. Yeah, of course.</p> <p>20 MS. VAN DYKE: Yeah. Okay. All right.</p> <p>21 Sounds good. We can --</p> <p>22 MR. SHEAROUSE: We can go off the record.</p> <p>23 MS. VAN DYKE: Yeah. Let's go off. Let's</p> <p>24 come back -- it's like 11:17. Let's say -- is ten</p> <p>25 minutes okay?</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. All right. What's her name?</p> <p>2 A. Renee Carr.</p> <p>3 Q. All right. And what happened with this, this incident</p> <p>4 of interfering with your leave?</p> <p>5 A. It was only for one day and I called off. She</p> <p>6 insisted I called off for my spouse because I had FMLA</p> <p>7 for him because he just had knee surgery, and I turned</p> <p>8 in my paperwork, and we went back and forth. So I got</p> <p>9 ahold of HR, and HR sided with me --</p> <p>10 Q. Okay. So --</p> <p>11 A. -- because I did the proper documentation.</p> <p>12 Q. All right. So you had --</p> <p>13 Did you have multiple or a couple types of</p> <p>14 FMLA leave going at that time?</p> <p>15 A. I'm not sure. I'd have to look.</p> <p>16 Q. Okay. Did you have one for your husband?</p> <p>17 A. Oh, you mean that. Yes.</p> <p>18 Q. Yeah.</p> <p>19 A. So I have -- at that time I had -- I had one for my</p> <p>20 husband, he had his knees replaced last year, and then</p> <p>21 I had one for my spine and one for my asthma and COPD.</p> <p>22 Q. Was the --</p> <p>23 A. I was out --</p> <p>24 What?</p> <p>25 Q. Oh, sorry. Go ahead. I didn't mean to interrupt.</p>	<p style="text-align: right;">Page 57</p> <p>1 MR. SHEAROUSE: That's fine with me.</p> <p>2 MS. VAN DYKE: Okay. So we'll come back in</p> <p>3 ten minutes.</p> <p>4 MR. SHEAROUSE: Okay.</p> <p>5 MS. VAN DYKE: All right. Thanks.</p> <p>6 (Recess taken at 11:17 a.m.)</p> <p>7 (Back on the record at 11:32 a.m.)</p> <p>8 BY MS. VAN DYKE:</p> <p>9 Q. Okay. Miss Miller, your attorney sent me this e-mail,</p> <p>10 which I'd like to mark as Exhibit Number 2.</p> <p>11 DEPOSITION EXHIBIT NUMBER 2</p> <p>12 WAS MARKED BY THE REPORTER</p> <p>13 FOR IDENTIFICATION</p> <p>14 BY MS. VAN DYKE:</p> <p>15 Q. Is this the e-mail you're referring to from Rosanna</p> <p>16 where she says you can't wear the N-95 mask?</p> <p>17 A. Yes.</p> <p>18 Q. All right. Okay. And do you see where she says, We</p> <p>19 need to reserve these masks for the medical staff on</p> <p>20 the front lines?</p> <p>21 A. I see that, but we were at the front lines.</p> <p>22 Q. All right. What did you understand the front lines to</p> <p>23 mean?</p> <p>24 A. Near those patients with COVID.</p> <p>25 Q. Do you believe Beaumont had a different definition of</p>

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<p style="text-align: right;">Page 58</p> <p>1 that?</p> <p>2 A. I don't know what they thought.</p> <p>3 Q. Do you know if they were referring to the nurses and</p> <p>4 doctors working directly with the patients?</p> <p>5 A. They could have.</p> <p>6 Q. All right. And it said --</p> <p>7 Were you provided with gowns?</p> <p>8 A. No.</p> <p>9 Q. Okay. Well, in the e-mail it says, We've supplied the</p> <p>10 department with surgical masks, gowns, and gloves for</p> <p>11 your protection.</p> <p>12 Do you know if that's true?</p> <p>13 A. It's not true. We had gloves --</p> <p>14 Q. What is --</p> <p>15 A. We had gloves and paper masks.</p> <p>16 Q. But not gowns?</p> <p>17 A. Um-um. No.</p> <p>18 Q. Were you working on March 24th?</p> <p>19 A. Yes.</p> <p>20 Q. How long did you work for that day?</p> <p>21 A. The whole day. If I did --</p> <p>22 I -- I don't know if I worked exactly on that</p> <p>23 March 24th, tell you the honest truth, I don't</p> <p>24 remember my schedule, but if I was working that day --</p> <p>25 yeah, I would be working that day.</p>	<p style="text-align: right;">Page 60</p> <p>1 was when we found out that COVID was here, we started</p> <p>2 using them.</p> <p>3 Q. Every day that you worked from, say -- and I think --</p> <p>4 I don't recall, too. It was like middle of March when</p> <p>5 we went on lockdown.</p> <p>6 A. Um-hum.</p> <p>7 Q. But from every day on did Beaumont supply an N-95 to</p> <p>8 you?</p> <p>9 A. No.</p> <p>10 Q. There were days --</p> <p>11 A. I mean, I -- I --</p> <p>12 You mean before this e-mail?</p> <p>13 Q. Correct.</p> <p>14 A. I don't remember.</p> <p>15 Q. Were there days where you wore the N-95 masks that you</p> <p>16 had?</p> <p>17 A. There was.</p> <p>18 Q. Or by "you had," I mean the ones that you had at home.</p> <p>19 A. Yes.</p> <p>20 Q. All right. In terms of the co-workers that you</p> <p>21 complained to about this -- and if it helps to see the</p> <p>22 listing on this e-mail, which is Exhibit 2, please</p> <p>23 take a look, but who was present during your</p> <p>24 conversation with Rosanna in the lobby?</p> <p>25 A. It's hard to remember, so I'll have to figure</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Okay. And your leave began March 25th?</p> <p>2 A. I do believe. It was on that Saturday.</p> <p>3 Q. And you said that you complained to co-workers about</p> <p>4 being unable to wear the N-95 mask.</p> <p>5 A. Yes, and other co-workers also complained.</p> <p>6 Q. All right. And who specifically did you complain to?</p> <p>7 A. Everybody heard our conversation, mine and Roseanne.</p> <p>8 Roseanne got in my face. It was rude.</p> <p>9 Q. How did she get in your face?</p> <p>10 A. She was yelling and screaming at me and told me it</p> <p>11 was -- that that's just the Beaumont rules, and if I</p> <p>12 didn't like it, I could take a leave of absence at my</p> <p>13 expense.</p> <p>14 Q. Did you yell at her at all?</p> <p>15 A. Yes. I told her I did not believe that she had the</p> <p>16 right to state that the doctors' and nurses' life was</p> <p>17 more important than mine, I have a underlying problem</p> <p>18 of asthma and COPD.</p> <p>19 Q. And before March 23rd was Beaumont supplying or</p> <p>20 offering up the N-95 mask for patient registration?</p> <p>21 A. When they could.</p> <p>22 Q. Were you able to use a --</p> <p>23 Like when is the first time you used an N-95</p> <p>24 mask that Beaumont supplied?</p> <p>25 A. I don't exactly remember the exact date. I know it</p>	<p style="text-align: right;">Page 61</p> <p>1 it --</p> <p>2 I don't have the schedule in front of me what</p> <p>3 person was working that day. It would be people who</p> <p>4 were on the day shift on that day.</p> <p>5 Q. Okay. And do you recall specifically having separate</p> <p>6 conversations with anyone to talk about this?</p> <p>7 A. Everybody was talking about it.</p> <p>8 Q. All right. Who did you discuss this with?</p> <p>9 A. I don't know -- I don't remember their exact names. I</p> <p>10 mean, there's --</p> <p>11 Anybody who was on the day shift who was also</p> <p>12 angry about that. We were all angry about it. Some</p> <p>13 -- some people didn't care because they don't have</p> <p>14 those kind of problems, but I know -- I know that</p> <p>15 Adriana was very upset. I don't know if she was there</p> <p>16 that day for that.</p> <p>17 Q. Okay.</p> <p>18 A. Because when I came back, she -- when I came back one</p> <p>19 day, she was -- they said she had quit.</p> <p>20 Q. And that's when you came back in July?</p> <p>21 A. I don't know when she quit, tell you the honest truth.</p> <p>22 Q. Do you know why your doctor released you to work in</p> <p>23 July?</p> <p>24 A. He said that the COVID had basically kind of subside</p> <p>25 and you guys were allowing me to wear the N-95 again.</p>

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<p style="text-align: right;">Page 62</p> <p>1 Q. How do you know that you were allowed to wear an N-95 2 mask? 3 A. There was a e-mail sent out I'm assuming. 4 I don't -- I don't exactly remember how I 5 found out, but I was connected to the e-mails from 6 work at home. 7 Q. All right. So it could have been an e-mail? I mean, 8 who -- if -- who would the e-mail have come from? 9 A. It would have come from the management. 10 Q. And that's either Rosanna -- well, it wouldn't have 11 come from -- 12 A. It could have been Roseanne. It could have been Beth 13 Karr. It could have been Shauna. That was the -- 14 that was another manager that was there for a short 15 time. 16 Q. When you complained to Geri, did you regularly 17 communicate with Geri via phone or e-mail? 18 A. Sometimes I did it in person, sometimes I did it on 19 -- I did -- I did it by e-mail, and sometimes -- I 20 don't -- 21 It depend on the situation what -- what we're 22 -- what we're talking about. If we're talking about 23 the N-95, I can't tell you if it was e-mail or if 24 telephone call. It's been a long time. It's been 25 almost two -- over two years.</p>	<p style="text-align: right;">Page 64</p> <p>1 wrong. She says, no, I'm right. I says, I'm sorry, 2 but you are wrong, that's not who I called for, it was 3 for my asthma, and she said, well, you need to change 4 it to your husband's or I'm not going to accept it. 5 Q. And was there anything else discussed with Renee at 6 that time? 7 A. It may -- it may have been a review or something, I'm 8 not exactly sure. Before -- prior to that I don't 9 know. They do monthly reviews for everybody. 10 Q. And did you -- 11 And then you said you went to Human 12 Resources, correct? 13 A. Yes. 14 Q. Okay. And who in Human Resources? 15 A. I don't know her name. 16 Q. Could it have been Monica Holbrook? 17 A. Oh, I did go to Monica Holbrook first. I emailed her. 18 She was still with the FMLA. So that's who I was 19 supposed to contact, I forgot about that, and I think 20 -- I may or may not -- after that I went -- I do 21 believe I went to HR because Mon- -- I think Monica 22 said something about she didn't deal with that part or 23 something. 24 Q. I'm sorry. What's that? She didn't -- 25 A. She doesn't -- I think she said something about she</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Would you still have access to your sent e-mail on 2 that topic? 3 A. I'd have to look for it because Beaumont and Spectra 4 decided to delete all e-mails. 5 Q. Oh, with the merger? 6 A. Yes. Anything 18 months and back are gone, there's no 7 access to them whatsoever, and according to the new 8 rule, I can't have access to it. 9 Q. Okay. Let's go back to your claim about interfering 10 with your FMLA leave, and that -- I believe you were 11 saying that Renee would question you about whether the 12 day you called in was for your husband or yourself? 13 A. Yes. 14 Q. Okay. And she claims -- if I understand correctly, 15 she claimed that you said it was for your husband. 16 A. Yes. I called in like I normally do if I need it, and 17 I have to tell them FMLA is for my asthma is exactly 18 what I said on the telephone to her. I came back the 19 next day after and I put in the paperwork, put in the 20 date of it -- of the incident and I wrote down asthma. 21 She ended up pulling me into the office 22 because she got -- I gave it back to her because 23 you're supposed to give copies to her so she can 24 submit it to HR, and she ended up telling me that I 25 called in for my husband, not me, and I says you're</p>	<p style="text-align: right;">Page 65</p> <p>1 doesn't deal with that area -- 2 Q. All right. 3 A. -- approves and denies the FMLA. Again, it's been a 4 while, so I'm not stating that I am totally correct 5 about that part. 6 Q. Okay. And then what ended up happening once you went 7 to HR? 8 A. They had me submit the documentation. I submitted it 9 to Renee the first time and -- and then I also sent 10 the letter, the other one, the revamped one that she 11 wanted me to send for my -- that Renee wanted me to do 12 for my husband. And the HR sided with -- agreed that 13 I was in the right because I had submitted the 14 paperwork correctly and it -- so it was not for my 15 husband, it was for me. 16 Q. So you were allowed to take that day off for -- under 17 the FMLA leave. 18 A. Yes, because I had a major asthma attack that day, day 19 before. 20 Q. You said that you also had a leave going for your 21 spine, I believe. 22 A. Yes. Degeneration of the spine. 23 Q. Who's your treating physician for that? 24 A. That's -- that's also Dr. -- it's Dr. Gatla, Dr. 25 Khanna. I don't know who signed the papers, tell you</p>

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<p style="text-align: right;">Page 66</p> <p>1 the honest truth, for that one. I'd have to look.</p> <p>2 Q. Are you on medication for that?</p> <p>3 A. Yes.</p> <p>4 Q. What medication?</p> <p>5 A. I am on Norco and Tylenol, and I do not take Norco</p> <p>6 like every day. I don't do that every day.</p> <p>7 Q. How often do you take Norco?</p> <p>8 A. As needed.</p> <p>9 Q. When's the last time you took Norco?</p> <p>10 A. Yesterday.</p> <p>11 Q. And Tylenol, what's the dosage on that?</p> <p>12 A. 650 milligrams for arthritis.</p> <p>13 Q. How often do you take that?</p> <p>14 A. I take that -- I take a lot. About every other day.</p> <p>15 It depends on the day. Depends on weather, too,</p> <p>16 because it's arthritis of the spine.</p> <p>17 Q. Okay. So, yeah, I was just going to ask you. The</p> <p>18 arthritis, is that relating to your spine?</p> <p>19 A. It's arthritis and degeneration of the bones. It's</p> <p>20 all -- I don't know how to explain it. I'm not a</p> <p>21 doctor. So there's both things going on there.</p> <p>22 Q. Have you been to physical therapy for it?</p> <p>23 A. Doctor just gave me a script for it. I went to</p> <p>24 therapy years ago, long time ago when I was a kid.</p> <p>25 Q. Was it for your spine then?</p>	<p style="text-align: right;">Page 68</p> <p>1 A. Temazepam. Temazepam. Oh, Restoril. Restoril. The</p> <p>2 name brand is Restoril, 7.5.</p> <p>3 Q. What type of medication is that? Is it a painkiller</p> <p>4 or muscle relaxer?</p> <p>5 A. It's to help you sleep, I guess.</p> <p>6 Q. Oh, okay.</p> <p>7 A. Because I don't sleep very good.</p> <p>8 Q. Have you ever been put on any muscle relaxers for it?</p> <p>9 A. I have one I'm on right now that I'm not allergic to.</p> <p>10 It is -- and they just started it. It is -- it's</p> <p>11 T-i-z-a-n-i-d-i-n-e, 4 milligrams.</p> <p>12 Q. How often do you take that?</p> <p>13 A. I'm supposed to take one every six hours, but I don't</p> <p>14 take them before I go to work because they make you</p> <p>15 drowsy.</p> <p>16 Q. Do you take it after work and then at nighttime?</p> <p>17 A. Yes.</p> <p>18 Q. Are there any other medications you've been placed on</p> <p>19 for your spine?</p> <p>20 A. Well, it's -- I -- I have -- I've had to see a foot</p> <p>21 doctor for the pinched nerves in my spine that send</p> <p>22 signals down to my spine. I'm on Neurontin.</p> <p>23 Q. Neurontin?</p> <p>24 A. And I take that -- I take that at night, too.</p> <p>25 Q. Have you ever been on gabapentin?</p>
<p style="text-align: right;">Page 67</p> <p>1 A. Yes.</p> <p>2 Q. How long ago was that?</p> <p>3 A. Over 20 years ago.</p> <p>4 Q. All right.</p> <p>5 A. I just do the exercises that they taught me.</p> <p>6 Q. When were you first diagnosed with this degeneration</p> <p>7 issue with your spine?</p> <p>8 A. I don't know exactly. It's been a long time.</p> <p>9 Q. Was it when you were a kid or --</p> <p>10 A. No, not when I was a child. It didn't happen -- I</p> <p>11 mean, I didn't even know I really had it until, I</p> <p>12 would say, the last -- I don't know. It could be five</p> <p>13 years. It could be eight years. I'm not sure. I</p> <p>14 have to look at my medical records.</p> <p>15 Q. Have you had any cortisone shots for your spine?</p> <p>16 A. No.</p> <p>17 Q. All right. Have you consulted with a -- like a</p> <p>18 neurologist or a neurosurgeon?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And who is that?</p> <p>21 A. I went to Dr. Ram -- Ram. I don't know. Ram Garg or</p> <p>22 something like that. He's a neurologist. I just seen</p> <p>23 him a few weeks ago, and he gave me medications, but</p> <p>24 they're not working.</p> <p>25 Q. Was medications are those?</p>	<p style="text-align: right;">Page 69</p> <p>1 A. That's what it is.</p> <p>2 Q. Yeah. Neurontin's gabapentin, right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. All right. How much are you on of the</p> <p>5 gabapentin?</p> <p>6 A. 300 milligrams, one at night.</p> <p>7 Q. Just one at night?</p> <p>8 A. Um-hum. You can't take too much -- all medications</p> <p>9 together.</p> <p>10 Q. What has the --</p> <p>11 And with your --</p> <p>12 The neurologist and the foot doctor, is that</p> <p>13 through Beaumont as well?</p> <p>14 A. Yes.</p> <p>15 Q. What has the foot doctor said?</p> <p>16 A. The foot doctor -- because -- he said that if that --</p> <p>17 if that medicine didn't work, then I would have -- we</p> <p>18 would have to do something else. I got shots in my</p> <p>19 feet for it before, I got three in each feet, but the</p> <p>20 medicine seems to be working and stopping that problem</p> <p>21 as long as I'm on that with the nerves.</p> <p>22 Q. Where is the degeneration in your spine?</p> <p>23 A. I'd have to look at the MRI test results. They're</p> <p>24 online.</p> <p>25 Q. Is it lower?</p>

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<p style="text-align: right;">Page 70</p> <p>1 A. It's lower and throughout the whole spine from the 2 neck down. 3 Q. Has there been any discussion about surgery? 4 A. I've not talked to a surgeon yet because it's starting 5 to turn to scoliosis. 6 Q. Are you -- and you haven't -- 7 Have you started physical therapy yet or not? 8 A. No. I have to find a Beaumont doctor. 9 Q. What do you mean? 10 A. Somebody who's in network. 11 Q. Oh, okay. All right. So you're looking to do 12 physical therapy through Beaumont? 13 A. I have to. It's the only insurance I have. 14 Q. Since we're running -- 15 And with your spine with the FMLA leave, is 16 it where you're allowed to call off certain days or 17 were you off for a set period of time? 18 A. I think it's intermediate, two to three days maybe at 19 a time. I don't remember. 20 Q. Okay. 21 A. But I've never called off for two or three days in a 22 row, not that I remember. 23 Q. And while we're at it here, going through your 24 medication, what other medication are you on? 25 A. I'm on Prozac, 30 milligrams. I am also on BuSpar, 15</p>	<p style="text-align: right;">Page 72</p> <p>1 MS. VAN DYKE: And, Austen, I'll follow up 2 with you and Carla for a production of that list as 3 well. 4 MR. SHEAROUSE: Okay. 5 BY MS. VAN DYKE: 6 Q. You mentioned earlier that you're also on Xanax? 7 A. Yes, 5.0. 8 Q. Was it -- 9 A. Twice a day. 10 Q. Is it 0.5 or 5.0? 11 A. 0.5. I'm sorry. 12 Q. Okay. And that's twice a day? 13 A. Yes. 14 Q. All right. So this morning what medication did you 15 take? 16 A. I took -- I took the Xanax and I took all my 17 medications for my asthma that I'm supposed to do, the 18 puffs and all that. 19 Q. Okay. Anything else? 20 A. I may not take any of the Prozac or not, that with the 21 Xanax. I'll take that later tonight. 22 Q. And what about the BuSpar? 23 A. Yeah, I have -- I had -- I have to take that in a 24 little while. 25 Q. What asthma medication did you take this morning</p>
<p style="text-align: right;">Page 71</p> <p>1 milligrams, and -- working on the list here. Oh. I'm 2 also on -- well, I'm also on lidocaine patches for my 3 spine. I take that as needed. 4 Q. Are those prescription? 5 A. Yes. 6 Q. All right. And for the BuSpar and Prozac, is it once 7 a day? 8 A. The BuS- -- let's see here. So the BuSpar is twi- -- 9 is once a day and -- let me double-check. Or, no, he 10 increased it to twice a day. That's right. I forgot. 11 I start to forget. And then the Fluoxetine is -- this 12 is 10 milligrams for Prozac and then 20 milligrams. 13 Yeah. So they're both once a day, but it's 30 14 milligrams together. 15 Q. Okay. So is it 10 in the morning, 20 at night or vice 16 versa? 17 A. No. It's all together. 18 Q. Oh, it is. Okay. Right. 19 A. Again, I have -- some have -- I have to take later on 20 when I get home because they make you sleepy and you 21 have to be careful. 22 Q. And I'm going to ask you. Do you have a list of your 23 medication in front of you? 24 A. I do. 25 Q. Okay. I am going to ask your attorney.</p>	<p style="text-align: right;">Page 73</p> <p>1 specifically? Because I know there's quite a few. 2 A. Okay. So I got the prednisone and the Advair and the 3 Spiriva and the nebulizer and -- yeah. 4 Q. Albuterol? 5 A. Advair, yeah. 6 Huh? 7 Q. Albuterol? 8 A. Yeah. Yeah, the inhaler. Yeah, the rescue inhaler, 9 too. 10 Q. Okay. 11 A. So you got -- the albuterol is for the nebulizer 12 solution, the 2.5, and then you got the -- you got the 13 other one, the rescue inhaler. 14 Q. All right. So is there anything else on your list or 15 that you recall that you're also on? 16 A. They have listed amitriptyline, but I'm not on that. 17 They gave it to me one time and I had a bad reaction. 18 I'm not on that. 19 Q. What medication is that again? I'm sorry. 20 A. Amitriptyline. It's also for depression, but I'm not 21 on that one. It's on this list, but I'm not on that 22 one. 23 Q. Anything else? Any other medication for the anxiety 24 and depression? 25 A. No. Not that I can remember.</p>

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<p style="text-align: right;">Page 74</p> <p>1 Q. When did you first go on the Prozac?</p> <p>2 A. I started the Prozac either October or November last</p> <p>3 year.</p> <p>4 Q. All right. What about the BuSpar?</p> <p>5 A. This --</p> <p>6 Around the same time, if not a couple -- a</p> <p>7 month or so later. I'm not sure.</p> <p>8 Q. And what about the gabapentin?</p> <p>9 A. That was this year.</p> <p>10 Q. When was that?</p> <p>11 A. I don't know exactly what day. It's a foot doctor.</p> <p>12 Q. Okay.</p> <p>13 A. He's in network. He's at Athens Clinic in Brownstown.</p> <p>14 Q. And the gabapentin, is that -- that's to help with the</p> <p>15 nerve issues in your leg?</p> <p>16 A. Well, the pinched --</p> <p>17 According -- according to the foot doctor,</p> <p>18 there's a pinched nerve and it -- and it makes me --</p> <p>19 it sends signals down to my feet and make my feet</p> <p>20 hurt. I don't know how that works, I'm not a doctor,</p> <p>21 and that's why he put me on it.</p> <p>22 Q. All right. To jump back to this exhibit here, which</p> <p>23 is Exhibit 1, is there any point in time where you</p> <p>24 were denied FMLA leave by Beaumont?</p> <p>25 A. I was not denied. No.</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. What was the date you returned?</p> <p>2 A. July. I don't remember what exact date. I'm trying</p> <p>3 to think.</p> <p>4 Q. In March 2022 who was your supervisor?</p> <p>5 A. My supervisor, Ashley Fields and Renee Carr.</p> <p>6 Q. All right. And what was the first name? Was it</p> <p>7 Ashley?</p> <p>8 A. Ashley and then Fields.</p> <p>9 Q. Fields.</p> <p>10 A. Like a field. I think there's a S at the end, but I'm</p> <p>11 not sure.</p> <p>12 Q. And why did you go out on leave then?</p> <p>13 A. Because the managers and everybody was harassing me.</p> <p>14 Q. All right. Could you explain that for me?</p> <p>15 A. They were always pulling me in the office and</p> <p>16 belittling me and telling me I was doing the wrong</p> <p>17 thing, but yet other people were doing the same exact</p> <p>18 thing and they weren't talking to them at all about</p> <p>19 nothing.</p> <p>20 Q. Okay. So what -- what were they saying you were doing</p> <p>21 wrong?</p> <p>22 A. They claimed that I had -- one time the Beaumont --</p> <p>23 they claimed that I went in somebody's chart, and then</p> <p>24 another time they claimed I did not collect a co-pay,</p> <p>25 which was wrong, both of those were wrong.</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. How many leaves are you -- do you currently have</p> <p>2 running right now?</p> <p>3 A. I'm not on leave right now.</p> <p>4 Q. Okay. What about the intermittent for your asthma</p> <p>5 or --</p> <p>6 A. Oh, is that what you're talking about?</p> <p>7 I had -- I had the one for the asthma right</p> <p>8 now, and Cheryl Cobbs did not approve the one for my</p> <p>9 spine because she sent in an e-mail that since I'm</p> <p>10 already -- because I was already on -- going on</p> <p>11 medical leave, that -- that I did not need that one,</p> <p>12 so she actually denied that one.</p> <p>13 Q. Who denied it?</p> <p>14 A. Monica Holbrooks.</p> <p>15 Q. And that's because you're -- you're going out on</p> <p>16 another leave?</p> <p>17 A. Yes.</p> <p>18 Q. All right. And which -- which leave was that?</p> <p>19 A. It was this past year. It was for mental.</p> <p>20 Q. All right. And what was the date of your leave?</p> <p>21 A. It was in March. It started in March again.</p> <p>22 Q. 2020?</p> <p>23 A. Um-hum.</p> <p>24 Q. How long were you out for?</p> <p>25 A. Four or five months.</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. Do you know if there was an investigation about the</p> <p>2 chart issue?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And when did you find out about that and how?</p> <p>5 A. Well, that -- that was really bad.</p> <p>6 Union steward was already there for you guys,</p> <p>7 not me, and I -- they told me to come down. I had no</p> <p>8 idea what was going on, and when I got there, there</p> <p>9 was -- I'm trying to think. I know there was -- I</p> <p>10 don't know if it's Teri or Jennifer. I have -- I have</p> <p>11 to look at my notes, but I know Ashley and Renee were</p> <p>12 there and I -- I'm thinking Jennif- -- I don't know.</p> <p>13 I don't remember if Jennifer White or if it was Teri</p> <p>14 Knight. Teri Knight was a director at that time.</p> <p>15 Okay? And then they had HR and somebody else and</p> <p>16 somebody else for -- for bad integrity and all this</p> <p>17 other stuff, I mean all on video chat.</p> <p>18 Q. Okay. What was said to you at this meeting?</p> <p>19 A. That I had went into somebody's chart.</p> <p>20 Q. Did they say how they -- why they thought that?</p> <p>21 A. They claimed that I went --</p> <p>22 No. They just said that they had to</p> <p>23 investigate every time somebody clicked into a chart.</p> <p>24 They claimed it was like from 2013 or '14 or something</p> <p>25 like that I think it was. I'm not exactly for the</p>

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<p style="text-align: right;">Page 78</p> <p>1 date, and I told them there's no way I would have done</p> <p>2 that, and they told me the patient's name. I said I</p> <p>3 don't even know who that is.</p> <p>4 Q. Do you know if Beaumont has some sort of computer</p> <p>5 monitoring system?</p> <p>6 A. Yes, they do.</p> <p>7 Q. They do? What do you know about that?</p> <p>8 A. I do know that they can watch what websites you go on</p> <p>9 and what you do and what patient's chart you can go</p> <p>10 into.</p> <p>11 Q. What was the outcome, if you know, of that</p> <p>12 investigation?</p> <p>13 A. It was dropped.</p> <p>14 Q. Dropped?</p> <p>15 A. Yes.</p> <p>16 Q. Was that ever communicated to you?</p> <p>17 A. It was never pursued any further. I was told by my</p> <p>18 director, Teri, that they come -- that they stated</p> <p>19 that they felt that it was not a deliberate thing and</p> <p>20 that I have a pattern of clicking on buttons.</p> <p>21 Q. Okay. Were you disciplined over this?</p> <p>22 A. No, but I was very scared and upset.</p> <p>23 Q. You mentioned too that there was an issue where they</p> <p>24 thought you didn't collect a co-pay?</p> <p>25 A. Yep.</p>	<p style="text-align: right;">Page 80</p> <p>1 understand this a little better. Is this a situation</p> <p>2 where you try to collect someone's co-pay, but the</p> <p>3 card's like denied or what?</p> <p>4 A. No. So the patient come in and she has -- she's</p> <p>5 supposed to -- apparently her insurance was not</p> <p>6 working, but it did not state not to let the patient</p> <p>7 go, and the patient was having surgery, and I</p> <p>8 proceeded to let her go because the way I was trained</p> <p>9 is that you are not to deny anybody any services,</p> <p>10 you -- you can't deny them services if they cannot</p> <p>11 afford it. I was -- and it was already -- and it</p> <p>12 states in your paperwork that if you flag the patient</p> <p>13 -- or flag the benefit advisor, they call it the BA,</p> <p>14 then that's all I have to do, I have to just let them</p> <p>15 be informed, and the benefit advisor had tried to call</p> <p>16 the patient and she was aware of the situation.</p> <p>17 Q. All right. So you have a meeting and you said that</p> <p>18 Geri was there, right?</p> <p>19 A. Yep.</p> <p>20 Q. And who else was there?</p> <p>21 A. That one? I think Ashley and Renee and Jennifer</p> <p>22 White.</p> <p>23 Q. And what did they say to you?</p> <p>24 A. They stated I should have contacted them and I should</p> <p>25 have collected the co-pay.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. When did that take place?</p> <p>2 A. That took place in the beginning of this year</p> <p>3 sometime.</p> <p>4 Q. And what happened with that?</p> <p>5 A. With the outcome or --</p> <p>6 Q. Yeah, or like -- or how did it come to your attention?</p> <p>7 A. Okay. So, again, the union steward was there for</p> <p>8 Beaumont again. I had no idea that she was even</p> <p>9 there. She -- anyways, when I walked in, I had no</p> <p>10 idea what they were talking about, and they stated I</p> <p>11 should have got ahold of benefit advisor, the benefit</p> <p>12 advisor is already flagged and I should have collected</p> <p>13 co-pay.</p> <p>14 Q. Is this another system flagging issue?</p> <p>15 A. No. In our -- there's a certain -- there's a process</p> <p>16 that you do. Then you go through to collect what --</p> <p>17 what -- who you have to inform that there's a issue</p> <p>18 with their billing. Well, the benefit advisor was</p> <p>19 informed, and that's why I did not -- I didn't contact</p> <p>20 the benefit advisor. She was already informed.</p> <p>21 Q. How was she informed?</p> <p>22 A. It shows up on her -- when you click on that, whoever</p> <p>23 did it, somebody else flagged it for her, so it shows</p> <p>24 up on her work queue.</p> <p>25 Q. Okay. Is this a situation -- I guess I need to</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. And what was your response?</p> <p>2 A. I said that's not -- I wasn't trained to do that. I</p> <p>3 was trained not -- not to stop a patient from having</p> <p>4 any services, that's not the way I was trained, and I</p> <p>5 says the benefit advisor was flagged. It states it in</p> <p>6 the policy it was flagged.</p> <p>7 Q. Did they say anything else after that?</p> <p>8 A. They said that they were still going to give me a</p> <p>9 correction and wanted me to sign the correction.</p> <p>10 Q. And who said that? Was it Teri or --</p> <p>11 A. Jennifer White.</p> <p>12 Q. Did you sign the correction?</p> <p>13 A. I refused to.</p> <p>14 Q. And what was the outcome of this?</p> <p>15 A. They put it on my file.</p> <p>16 Q. So you still have the correction.</p> <p>17 A. Yeah, but it's wrong.</p> <p>18 Q. Did you file a grievance over it?</p> <p>19 A. I tried.</p> <p>20 Q. And what happened with that?</p> <p>21 A. I sent it to Geri. Geri never contacted me. So I was</p> <p>22 out of time. You only -- you only have three days to</p> <p>23 do it, and Geri never contacted me back, and she's the</p> <p>24 only union steward we have. I tried to call</p> <p>25 corporate. Corporate never returned my phone calls.</p>

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<p style="text-align: right;">Page 82</p> <p>1 Q. Who in corporate?</p> <p>2 A. The corporate of the union.</p> <p>3 Q. Okay.</p> <p>4 A. I left them a message, but they never got back to me.</p> <p>5 Q. Did you ever talk to Geri about this?</p> <p>6 A. Directly? No. I sent her e-mails. Kept asking her</p> <p>7 and begging her to please send me something, send me</p> <p>8 somebody who could help me. I had no idea I only had</p> <p>9 three days. I didn't know all the union rights until</p> <p>10 I started reading the book myself.</p> <p>11 Q. All right. Going back to your Complaint at -- here.</p> <p>12 You have a -- and you also have an FMLA</p> <p>13 retaliation claim and a disability retaliation claim.</p> <p>14 I'll start with the FMLA.</p> <p>15 How has Beaumont retaliated against you?</p> <p>16 A. They keep harassing me. Every time I turn in FMLA, I</p> <p>17 have to -- I have to tell them, no, it's for this, not</p> <p>18 that. I don't know how to explain it.</p> <p>19 Q. Who's harassing you?</p> <p>20 A. Renee Carr first accused me about my husband's, and</p> <p>21 that's what I was talking about, but then you got them</p> <p>22 always harassing me about something. They're always</p> <p>23 pulling me in the office.</p> <p>24 Q. But what else have you been pulled into the office</p> <p>25 about? Setting aside -- and -- and -- well, the two</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Do you deny doing so?</p> <p>2 A. I had told them I apologize if I did, but I don't</p> <p>3 believe I did.</p> <p>4 Q. And why don't you believe you did that?</p> <p>5 A. I don't -- I don't know who's telling them that. Down</p> <p>6 there there is a totally different department and</p> <p>7 there's -- there was -- there's just a lot of stuff</p> <p>8 going on at Beaumont with two different departments.</p> <p>9 Q. All right. So if they get banded in -- in --</p> <p>10 If someone gets banded incorrectly in</p> <p>11 registration, is it caught later?</p> <p>12 A. It could be.</p> <p>13 Q. Okay. And who would catch that?</p> <p>14 A. Either a technician, another -- another employee.</p> <p>15 Q. And is that when they ask the patient to say their</p> <p>16 name and birth date?</p> <p>17 A. Yes.</p> <p>18 Q. All right. Do you have other examples of how Beaumont</p> <p>19 has been harassing you?</p> <p>20 A. They --</p> <p>21 I'm not sure at this time. I'm just -- I'm</p> <p>22 really stressed out.</p> <p>23 Q. All right.</p> <p>24 MS. VAN DYKE: Austen, do you want to take a</p> <p>25 quick lunch break at some point?</p>
<p style="text-align: right;">Page 83</p> <p>1 incidents you talked about.</p> <p>2 A. They pulled me in for -- they claimed I banded the</p> <p>3 wrong patient.</p> <p>4 Q. When was this?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you --</p> <p>7 Who pulled you in?</p> <p>8 A. It had to be either Ashley or Jennifer or Renee</p> <p>9 because it had to -- they have more than one manager</p> <p>10 there.</p> <p>11 Q. And they said you banded the wrong patient?</p> <p>12 A. Yeah.</p> <p>13 Q. What does that mean?</p> <p>14 A. It means I put the --</p> <p>15 They claim I put the wrong wristband on them</p> <p>16 with the wrong name.</p> <p>17 Q. Okay. Did you get a write-up for that?</p> <p>18 A. I do believe I did.</p> <p>19 Q. And has that happened again or are there -- you know,</p> <p>20 is this a one-time occurrence or did it happen again?</p> <p>21 A. It's not happened again since then.</p> <p>22 Q. During the meeting when they said you banded the wrong</p> <p>23 patient, did you have any response?</p> <p>24 A. I don't remember what I said, tell you the honest</p> <p>25 truth.</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. SHEAROUSE: Yeah. Whenever, you know,</p> <p>2 whenever you're ready for that.</p> <p>3 MS. VAN DYKE: Okay. Let's go ahead and do a</p> <p>4 quick lunch break and then we can -- we can come back</p> <p>5 on this and get through some more of this, too.</p> <p>6 MR. SHEAROUSE: Okay.</p> <p>7 (Recess taken at 12:17 p.m.)</p> <p>8 (Back on the record at 1:08 p.m.)</p> <p>9 BY MS. VAN DYKE:</p> <p>10 Q. When we had the -- when we were looking back through</p> <p>11 the medical records, too, Miss Miller, we noticed that</p> <p>12 there are quite a few doctors who have been identified</p> <p>13 today, and previously identified we only had Dr.</p> <p>14 Gatla, if that's how you pronounce his name, and so</p> <p>15 are you willing to sign authorized release of your</p> <p>16 medical records for the other doctors we've discussed</p> <p>17 today?</p> <p>18 A. Well -- you mean Dr. Khanna and Dr. Ram?</p> <p>19 Q. And the podiatrist. Yeah. Yep.</p> <p>20 A. For those, yes, but for my mental, my lawyer has all</p> <p>21 that.</p> <p>22 Q. Yes, and I was going to get to that, too.</p> <p>23 You revoked your authorization for the -- for</p> <p>24 the records -- the psychology records.</p> <p>25 A. Um-hum.</p>

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<p style="text-align: right;">Page 86</p> <p>1 Q. Are you willing to produce that information?</p> <p>2 A. My lawyer is supposed to go through that and submit it</p> <p>3 to you.</p> <p>4 Q. Okay.</p> <p>5 A. That's what Carla told me.</p> <p>6 Q. Oh, all right. Yeah. I don't want to -- I don't want</p> <p>7 to know exactly what your attorney told you.</p> <p>8 MR. SHEAROUSE: Yeah. Just -- yeah. Just --</p> <p>9 THE WITNESS: Sorry.</p> <p>10 MR. SHEAROUSE: -- send over any</p> <p>11 authorizations that you would like and me and Carla</p> <p>12 will go through and get what --</p> <p>13 THE WITNESS: And I signed it already.</p> <p>14 MR. SHEAROUSE: Yeah.</p> <p>15 MS. VAN DYKE: Okay. All right. And then</p> <p>16 for the CVS employee records as well, are you willing</p> <p>17 to release those records?</p> <p>18 MR. SHEAROUSE: Just send that same thing</p> <p>19 over to --</p> <p>20 MS. VAN DYKE: Okay. All right.</p> <p>21 MR. SHEAROUSE: Anything related to records</p> <p>22 just send directly to me on my e-mail, Cc Carla. That</p> <p>23 way -- because I know she gets a lot of e-mails. So</p> <p>24 just -- it will get to the top of my e-mail list</p> <p>25 faster than it will hers.</p>	<p style="text-align: right;">Page 88</p> <p>1 leave issue where they thought you said your husband's</p> <p>2 leave -- or leave for your husband, but it was for</p> <p>3 you, the co-pay issue, banding the wrong patients, the</p> <p>4 investigation into that issue with another patient's</p> <p>5 chart.</p> <p>6 Is there anything specifically in addition to</p> <p>7 that, those incidents?</p> <p>8 A. I know that an issue about Monica about the FMLA, if I</p> <p>9 was denied. Like I said, it was Monica who denied the</p> <p>10 FMLA because she thought I was going on medical leave</p> <p>11 for my mental and said I did not -- I did not need it.</p> <p>12 That's the only other thing I can think of at this</p> <p>13 time.</p> <p>14 Q. And which leave again was that for that was denied?</p> <p>15 A. Well, the leave wasn't denied. I'm talking about when</p> <p>16 I applied --</p> <p>17 So I applied for FMLA the same day -- the</p> <p>18 same time, one for my back and one for my asthma prior</p> <p>19 to going out on medical leave, okay, because you had</p> <p>20 to submit it, and after she approved the one for</p> <p>21 asthma, I ended up having to request FMLA for a</p> <p>22 medical leave. And so she denied it because I was</p> <p>23 going to be on FMLA medical leave --</p> <p>24 Q. Okay.</p> <p>25 A. -- for the back.</p>
<p style="text-align: right;">Page 87</p> <p>1 MS. VAN DYKE: Yeah, absolutely, and I'll --</p> <p>2 and I'll go ahead. I mean, we do have a motion to</p> <p>3 compel pending with the Court for the psychology</p> <p>4 records, and --</p> <p>5 MR. SHEAROUSE: Okay.</p> <p>6 MS. VAN DYKE: So, you know, I know that</p> <p>7 we're -- we're going to be here for a little bit</p> <p>8 longer today, but I am reserving additional time to</p> <p>9 continue this deposition once we resolve those</p> <p>10 additional records, including -- there's an issue</p> <p>11 today with apparently accessing the tax records that</p> <p>12 were sent over this morning.</p> <p>13 And -- and, Austen, too, don't worry. We'll</p> <p>14 summarize everything in an e-mail, too, about the</p> <p>15 additional documents we're seeking, including the</p> <p>16 additional handwritten notes, the recent ones that</p> <p>17 Miss Miller has. And so we are going to reserve some</p> <p>18 time to continue her dep on another day once we obtain</p> <p>19 those records.</p> <p>20 MR. SHEAROUSE: Okay.</p> <p>21 MS. VAN DYKE: Okay.</p> <p>22 BY MS. VAN DYKE:</p> <p>23 Q. All right. So, Miss Miller, we've talked about, you</p> <p>24 know, certain ways that you felt that Beaumont has</p> <p>25 harassed you, and to summarize, you talked about the</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. So she denied the one for the back because you were</p> <p>2 going to be on the other leave, right?</p> <p>3 A. Right, because I was going to be off. So she said</p> <p>4 there was no reason for me to have it, but --</p> <p>5 Q. Did you --</p> <p>6 Sorry. Go ahead.</p> <p>7 A. The only reason why I thought about it was it was --</p> <p>8 if I was able to come back before my FMLA expired, I</p> <p>9 would have it just in case, but like I said, she</p> <p>10 denied it either way.</p> <p>11 Q. Did you ever resubmit it for your back?</p> <p>12 A. No. She says I had no more FMLA --</p> <p>13 Q. Okay.</p> <p>14 A. -- until next March.</p> <p>15 Q. Did you exhaust your FMLA this year?</p> <p>16 A. Yes.</p> <p>17 Q. So for the leave you were on in March of 2020 when the</p> <p>18 pandemic started, was that a paid leave or unpaid</p> <p>19 leave?</p> <p>20 A. It was short-term disability leave.</p> <p>21 Q. Okay. Did you receive your full pay or a portion of</p> <p>22 it?</p> <p>23 A. Only received the 40 or 60 percent, whatever it was.</p> <p>24 Q. Under the short-term disability policies?</p> <p>25 A. Yeah.</p>

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<p style="text-align: right;">Page 90</p> <p>1 Q. Okay. All right. In addition to Monica's denial of</p> <p>2 the FMLA leave for your back, do you know of any other</p> <p>3 incidents where Beaumont harassed you?</p> <p>4 A. How far back we talking?</p> <p>5 Q. Well, you know, we can start this way. Do you have</p> <p>6 any examples of how Rosanna harassed you?</p> <p>7 A. Rosanna was always harassing me. She was always</p> <p>8 checking up on me.</p> <p>9 I worked in a totally different area of the</p> <p>10 hospital, it was called the medical side, medical</p> <p>11 building, and it's on the other side of the hospital</p> <p>12 from the ER, and she would purposely come check on me</p> <p>13 and sneak up behind me all the time, and then she</p> <p>14 ended up threatening me, pulling me aside.</p> <p>15 I came down to the EOB. She said she had to</p> <p>16 talk to me. I said what about, and she says nothing</p> <p>17 bad, I just need to talk to you, but after work.</p> <p>18 So I left my -- after work I went down there</p> <p>19 to her office, which really wasn't an office, it's</p> <p>20 where everybody else can hear everything, and she</p> <p>21 stated that if I did not get my numbers up of</p> <p>22 registration, that she was going to take me out of my</p> <p>23 position, and I told her that -- that I was doing the</p> <p>24 best I can, I'm only one person, and I'm registering</p> <p>25 between 80 to -- between 60 to 90 people a day for</p>	<p style="text-align: right;">Page 92</p> <p>1 need to register?</p> <p>2 A. No. Nope.</p> <p>3 Q. How many of --</p> <p>4 And when did this take place?</p> <p>5 A. That was in 2000 -- January of 2000 -- hold on. I'm</p> <p>6 thinking in January of 2020, but I'm not going to</p> <p>7 state that's correct because I don't know the exact</p> <p>8 date.</p> <p>9 Q. Was it before the pandemic?</p> <p>10 A. Yes. That's when she threatened me to take me out of</p> <p>11 the MOB.</p> <p>12 Q. And what does MOB stand for?</p> <p>13 A. Oh. It's just a Breast Care Center. It's another way</p> <p>14 they abbreviate it -- abbreviate it, I guess. I'm not</p> <p>15 sure why they call it the MOB. I guess mammograms of</p> <p>16 breast. Maybe that's what it is. That sounds about</p> <p>17 right.</p> <p>18 Q. And what are you looking at right now in front of you?</p> <p>19 A. These are my rec- -- these are my -- some of the</p> <p>20 e-mails I saved, well, I sent to my lawyer and you</p> <p>21 guys should have copies of.</p> <p>22 Q. All right. So at the time you were at a different</p> <p>23 building from Rosanna?</p> <p>24 A. Um-hum.</p> <p>25 Q. All right. Where did she sit?</p>
<p style="text-align: right;">Page 91</p> <p>1 just breast care imaging and ultrasounds and things</p> <p>2 like that down there, and then she said, I'm just</p> <p>3 telling you, I'm going to take you out of there.</p> <p>4 So I went above and went to her boss, Beth</p> <p>5 Karr. First I went to Geri, then I went to Beth.</p> <p>6 Q. What did Beth Karr say?</p> <p>7 A. We had a meeting between me, Geri, and Beth, and</p> <p>8 Roseanne admitted to it. She said, Yes, I did, but I</p> <p>9 didn't mean it like that.</p> <p>10 Q. Did you receive any discipline out of it?</p> <p>11 A. No.</p> <p>12 Q. Did Roseanne --</p> <p>13 A. But I wouldn't have got disciplined on that. That was</p> <p>14 her harassing me.</p> <p>15 Q. And she was telling you that you had to register more</p> <p>16 patients?</p> <p>17 A. Faster. Yeah.</p> <p>18 Q. Was -- do you know, was there a backup?</p> <p>19 A. It was a couple backups, but what happens is, like</p> <p>20 everybody else knows, when a patient comes -- shows up</p> <p>21 late for their appointment, it puts everybody else</p> <p>22 behind, and we're not allowed to turn them away even</p> <p>23 though they're late, unless they're like an hour or</p> <p>24 two. Then I have to ask the technician at that time.</p> <p>25 Q. Is there a targeted goal as to how many patients you</p>	<p style="text-align: right;">Page 93</p> <p>1 A. Well, the building is actually all connected to one</p> <p>2 hospital. Okay? So -- but she's over at the ER, and</p> <p>3 I don't know if that's west or east or south, I don't</p> <p>4 know. She's on the opposite side of the building.</p> <p>5 I'm at the other end of the building, and I don't know</p> <p>6 if you've ever been to Southshore, well, that's what</p> <p>7 they used to call it, or Beaumont Southshore. It's a</p> <p>8 really big place, so -- it holds over 500 people.</p> <p>9 There's five floors.</p> <p>10 Q. And she was your supervisor at the time?</p> <p>11 A. Yes.</p> <p>12 Q. And this day in question where she took you aside, how</p> <p>13 many people were working in patient registration in</p> <p>14 addition to you at the time?</p> <p>15 A. I don't remember. Whoever was on the day shift, but</p> <p>16 like I said, I wasn't working in the ER, but the</p> <p>17 people in the ER were able to hear the conversation</p> <p>18 because she -- we were out in the open. There was no</p> <p>19 closed doors or nothing.</p> <p>20 Q. So, you know --</p> <p>21 And actually, before the pandemic, how -- was</p> <p>22 it like you and three other people in the MOB? How</p> <p>23 did that work?</p> <p>24 A. There's only me.</p> <p>25 Q. Only you in the MOB?</p>

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<p style="text-align: right;">Page 94</p> <p>1 A. Um-hum. If I needed help, I would have to call down 2 there and request for help, and I only did it once in 3 a while when we had over 100 patients to sign in 4 because they would double book them at 9 o'clock, 5 10 o'clock in the morning. 6 Q. When you had to -- when -- 7 The few times you called down for help, how 8 would they then staff it? Would they send someone 9 from the ER? 10 A. Yes. I would have to call my supervisor, and my 11 supervisor was supposed to send somebody down to help 12 me. 13 Q. When you were working during this time, how many times 14 would Rosanna come through? 15 A. Every day almost. 16 Q. Do you have any other examples of how she harassed 17 you? 18 A. She also -- she belittled me and she yelled at me all 19 the time before I left in front of other employees and 20 would make me cry. I'd have to go -- I'd run -- I 21 actually had to go to the bathroom and I'd be crying 22 trying to hide from her because I didn't -- she really 23 -- she's -- she's not a nice person at all. 24 Q. Okay. So what would she yell at you about? 25 A. It was all different things. Go faster. You need to</p>	<p style="text-align: right;">Page 96</p> <p>1 pandemic hit I didn't -- I -- she gave my position 2 away while I was on FMLA. 3 Q. And how did that happen? 4 A. Well, she claimed it was seniority. 5 Q. Was the -- were they doing mammograms at the time? 6 A. What happened was, when the pandemic hit, we closed it 7 per -- per the state law and all that and -- we closed 8 all that stuff, and then they started reopening it a 9 little at a time. So when it went full-time, I was 10 supposed to be going back and go back to my regular 11 position at the Breast Care Center. And so I 12 submitted my paperwork like I was supposed to, and per 13 union rules, as long as you're not out for 120 days, 14 you go back to your original position wherever you 15 were working. 16 I had worked there since I left Taylor all 17 the way up until the pandemic. Once I ended up -- 18 when I sent her the letter, she sent me back a letter 19 saying that's no longer a option and you -- you have 20 to do a 9 -- a 9 to 5 or 9:30 to 5:30, and she -- and 21 I said, Well, what happened to the MOB? It's open. 22 And she said, I gave it to Renee. I forgot her name. 23 Labo, L-a-b-o. 24 Q. And did she explain why she gave it to Renee? 25 A. She stated it was by seniority by -- due to the union,</p>
<p style="text-align: right;">Page 95</p> <p>1 do this. Oh, by the way, you need to go give somebody 2 else a break. Oh, do this, do that. 3 I was only one person and she wanted me to 4 make -- she was only coming down on me to do everybody 5 else's job and there's more than one person in the 6 room. 7 Q. And who else is in the room? 8 A. Well, at the time it could have been Tina, it could 9 have been -- it could have been Tammy or Renee or -- 10 let me think. And there was Jessica at times. She 11 didn't come in till 10 o'clock, but she was like an 12 afternoon mid-shift. Yeah. Oh, and Adriana. There 13 was -- whoever basically was on day shift. Even the 14 nurses who -- even when she would belittle me in front 15 of the nurses. 16 Q. All the -- all the people you just mentioned, are they 17 -- were they in the MOB or were they in -- 18 A. No. 19 Q. -- ER? 20 A. No. They were in ER. 21 Well, you're talking about when they were -- 22 how else did she harass me. She didn't harass me like 23 that when I was down. There's days -- I would pick up 24 extra days and that's -- and she would harass me, and 25 then there was days that after the -- once the</p>	<p style="text-align: right;">Page 97</p> <p>1 but -- 2 Q. And the -- 3 So were you offered 9:30 to 5:30, was that in 4 ER or MOB? 5 A. That was in ER back with the pandemic. 6 Q. Did you complain to anyone about this? 7 A. I complained to Roseanne, and I sent a e-mail to Geri, 8 and I also sent a e-mail to the HR. 9 Q. All right. Do you have those e-mails in front of you? 10 A. I have to find them. 11 I have a e-mail for Geri on Wednesday, July 12 29th. It says -- I sent an e-mail to Geri, the union 13 steward, that I wanted to file a grievance against 14 Roseanne because she gave my position away and created 15 a position of 9 to 5:30 because that job was never 16 there until I had to go back. 17 Q. Did Geri respond? 18 A. Geri said -- I sent her a copy of the e-mail that 19 Roseanne sent me, what my new shift would be, and 20 then -- I don't know why, but it looks like it's out 21 of order. 22 Yeah, I don't -- I have to look for it. I 23 don't know when she actually returned, but I do know 24 everybody's got -- everybody has the copies. The 25 problem is is I kept having to pull them out and</p>

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<p style="text-align: right;">Page 98</p> <p>1 re-send them to you guys and apparently they got mixed</p> <p>2 up, so -- because I tried to keep it all together.</p> <p>3 Yeah, I don't have the response from Geri.</p> <p>4 Q. Is there any way you can obtain that response?</p> <p>5 A. Not from your guys's e-mail. Your e-mails were</p> <p>6 deleted by us, by, I guess, Spectra. I don't know</p> <p>7 what you want to call it. Spectra Corewell.</p> <p>8 Q. Was --</p> <p>9 If you know, did Renee have more seniority</p> <p>10 than you?</p> <p>11 A. She did have more seniority than me, she was above me,</p> <p>12 but when you're on FMLA, it does not apply from what I</p> <p>13 was -- from what I -- I have found.</p> <p>14 Q. And what are you basing that on, why it doesn't apply?</p> <p>15 A. Because when you're on FML- --</p> <p>16 She gave the job away before I even came</p> <p>17 back.</p> <p>18 Q. Okay. So Renee --</p> <p>19 A. I wasn't even back. She didn't start in the MOB until</p> <p>20 the same day I went back to work. She wasn't even</p> <p>21 walking or working down there. They had somebody else</p> <p>22 who was a part-time doing all the jobs.</p> <p>23 Q. Okay. So they had a part-time person who was in the</p> <p>24 MOB?</p> <p>25 A. For the part-time position, right, when they first</p>	<p style="text-align: right;">Page 100</p> <p>1 working pool. That's what they called it.</p> <p>2 Q. Were there layoffs in patient registration?</p> <p>3 A. There wasn't layoffs. I think they were just --</p> <p>4 either you used your PTO to have the days off from</p> <p>5 what I was told from the other ladies when I came</p> <p>6 back, and if you didn't use PTO, then you could get in</p> <p>7 a working pool and they would call you when they need</p> <p>8 you.</p> <p>9 Q. Okay.</p> <p>10 A. That's what I understood.</p> <p>11 Q. Were you ever part of that working pool or did that</p> <p>12 happen while you were out?</p> <p>13 A. That happened when I was out.</p> <p>14 Q. And was a --</p> <p>15 You mentioned this, but I just want to make</p> <p>16 sure I understand it. Was Renee, was she in the MOB</p> <p>17 already when you came off of your leave?</p> <p>18 A. No.</p> <p>19 Q. When did she start?</p> <p>20 A. Her first day, July 6, the same day I did.</p> <p>21 Q. All right. Is there anything else about Rosanna?</p> <p>22 A. Just the fact that she always belittled me, made me</p> <p>23 cry in front of people all the time, and put me --</p> <p>24 make me so upset I'd have to do a treatment.</p> <p>25 Q. When did you -- I mean, do you recall the incidents</p>
<p style="text-align: right;">Page 99</p> <p>1 opened up again.</p> <p>2 Q. Do you know when they opened up again?</p> <p>3 A. Well, I went back on July 6. I think it -- I think it</p> <p>4 was part-time, maybe a month, month and a half prior</p> <p>5 to that. I'm not exactly sure. See, I wasn't there,</p> <p>6 so --</p> <p>7 Q. Okay. Who was the part-time person who was in that --</p> <p>8 filling that role?</p> <p>9 A. It was Katie. She's no longer with us. She -- she</p> <p>10 moved on to --</p> <p>11 Oh, Katie, and her last name is A-p-k-e-r.</p> <p>12 Let me see here.</p> <p>13 Q. Apker?</p> <p>14 A. Yeah, I guess so. Apker. I think that's how you</p> <p>15 pronounce it.</p> <p>16 I know Katie was down there, but somebody</p> <p>17 else was also down there. I think they flipped it</p> <p>18 back and forth. I'm not sure because I didn't have</p> <p>19 the schedules for that, you know what I mean, because</p> <p>20 I wasn't there prior to that.</p> <p>21 Q. Okay. Was there --</p> <p>22 During the pandemic, were there any layoffs</p> <p>23 at some point?</p> <p>24 A. There was lots of layoffs from Wayne, and there was</p> <p>25 some layoffs, and then they had the -- they had a</p>	<p style="text-align: right;">Page 101</p> <p>1 where you cried?</p> <p>2 A. It was all the time, almost every day.</p> <p>3 Q. And who witnessed this?</p> <p>4 A. Most of the staff.</p> <p>5 Q. In -- was that in the MOB or the ER or both?</p> <p>6 A. The ER.</p> <p>7 Q. When did you stop reporting to Rosanna?</p> <p>8 A. When?</p> <p>9 Q. Yeah.</p> <p>10 A. After the EEOC came through because I filed a</p> <p>11 complaint and -- because they gave my position away</p> <p>12 and I wanted -- I wanted this harassment to stop</p> <p>13 because nobody cared. Beaumont didn't care. So I</p> <p>14 filed with the EEOC.</p> <p>15 Q. In addition to Geri, did you reach out to Human</p> <p>16 Resources about your complaints?</p> <p>17 A. I'm not sure if I did or didn't. I may have.</p> <p>18 Q. And why do you believe that Rosanna was treating you</p> <p>19 this way, allegedly?</p> <p>20 A. I don't know what her problem is, tell you the honest</p> <p>21 truth. I have no idea. Everybody who comes in</p> <p>22 contact with me likes me. So I don't know what -- why</p> <p>23 she did what she did.</p> <p>24 Q. Did you ever see her treat anyone else this way?</p> <p>25 A. I seen her treat other people bad, but not as bad as</p>

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<p style="text-align: right;">Page 102</p> <p>1 she treated me.</p> <p>2 Q. And who are those --</p> <p>3 A. She likes to be bul- -- she likes to be a bully.</p> <p>4 Q. Who else did you observe her treating, I guess, badly</p> <p>5 in your opinion?</p> <p>6 A. Other employees, but they would stand up to her where</p> <p>7 I would not.</p> <p>8 Q. And who are those other employees?</p> <p>9 A. Whoever is on the day shift or that was there. I</p> <p>10 don't know which ones they actually were. It would</p> <p>11 depend on the day. I know --</p> <p>12 I can't say exactly who. It could have been,</p> <p>13 I think, Renee -- Renee who left, Labo. She had</p> <p>14 problems with her. A lot of people did. She didn't</p> <p>15 know what she was -- I don't know. She just -- I</p> <p>16 don't know how to explain it. She's not a nice</p> <p>17 person.</p> <p>18 Q. When did Renee leave?</p> <p>19 A. She left later this year.</p> <p>20 Q. Did you talk to her about why she was leaving?</p> <p>21 A. She said something about management.</p> <p>22 Q. Did she say anything specifically about Rosanna?</p> <p>23 A. No, because by then Roseanne was not a -- was not a</p> <p>24 manager when she left.</p> <p>25 Q. What was Rosanna then?</p>	<p style="text-align: right;">Page 104</p> <p>1 the -- what do you call it? -- with getting the</p> <p>2 patient's file. Then there was one about banding the</p> <p>3 wrong patient. Then there was one about, oh, putting</p> <p>4 in the wrong order for the wrong leg or arm or</p> <p>5 something like that for an x-ray. Everybody does that</p> <p>6 on accident, and the imaging center always just fixes</p> <p>7 it, they always have. Prior to them taking over that</p> <p>8 part of the -- of the job, everybody did -- all they</p> <p>9 -- all they did was just change it. It was no big</p> <p>10 deal.</p> <p>11 Q. For the order issue, were you written up for that, the</p> <p>12 wrong -- like wrong arm or leg, whatever it was?</p> <p>13 A. Yes.</p> <p>14 Q. When was this?</p> <p>15 A. Hang on. Trying to find it.</p> <p>16 I can't seem to find it yet right now. I</p> <p>17 know I've seen it.</p> <p>18 Q. Okay.</p> <p>19 A. Register patient incorrectly, emergency room, was one</p> <p>20 of my e-mails. I don't know. It says a ankle injury.</p> <p>21 Q. What date was that?</p> <p>22 A. The date of the correction?</p> <p>23 Q. Yes.</p> <p>24 A. Okay. They signed it on the 28th. They say it was on</p> <p>25 the 20th.</p>
<p style="text-align: right;">Page 103</p> <p>1 A. Roseanne went back to her original job that she came</p> <p>2 from. She's a benefit advisor.</p> <p>3 Q. And then after Rosanna, that's when you began</p> <p>4 reporting to -- is it Renee Carr?</p> <p>5 A. Renee and -- Renee and Ashley, yes. Oh, and Teri</p> <p>6 because before Teri, Beth Karr resigned.</p> <p>7 Q. Do you have any complaints against Beth Karr?</p> <p>8 A. No.</p> <p>9 Q. Do you have any complaints against Teri Knight?</p> <p>10 A. I just think it was unfair about what they did to me,</p> <p>11 trying to pin me on that thing saying I was getting</p> <p>12 somebody's chart.</p> <p>13 Q. Oh, the investigation?</p> <p>14 A. Yes.</p> <p>15 Q. Anything else about Teri?</p> <p>16 A. No.</p> <p>17 Q. What about Ashley Fields?</p> <p>18 A. Ashley Fields, she's -- they're -- I don't know.</p> <p>19 They're always writing me up, so I don't know why.</p> <p>20 They seem to find something all the time and I don't</p> <p>21 understand it.</p> <p>22 Q. And you said always writing you up?</p> <p>23 A. Well, they try.</p> <p>24 Q. And what do you mean by that?</p> <p>25 A. I mean, the thing is -- like the one with the -- with</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. Okay. Which year? Sorry. What's the full date?</p> <p>2 A. 2022. That was this year, February. February 20th.</p> <p>3 Q. Is this a different --</p> <p>4 All right. Hold on. Let me share my screen.</p> <p>5 A. Must be something different.</p> <p>6 Q. Let me share my screen with you.</p> <p>7 All right. I have -- I have this one.</p> <p>8 Is this one of the corrective actions you're</p> <p>9 talking about or is this a different one?</p> <p>10 A. What's that one? That's the one I'm talking about</p> <p>11 right there.</p> <p>12 Q. Okay.</p> <p>13 A. That's the one I have in my hand.</p> <p>14 Q. All right.</p> <p>15 A. No, I'm not talking about that one. That was a</p> <p>16 different one, but this one was for the ER, so -- but</p> <p>17 there was another one a while back.</p> <p>18 Q. For banding?</p> <p>19 A. It must -- must have been.</p> <p>20 Q. And this is Ashley and Renee on this?</p> <p>21 A. Yes.</p> <p>22 Q. I'm sorry. And I'm going to mark this one Exhibit 3.</p> <p>23 DEPOSITION EXHIBIT NUMBER 3</p> <p>24 WAS MARKED BY THE REPORTER</p> <p>25 FOR IDENTIFICATION</p>

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<p style="text-align: right;">Page 106</p> <p>1 BY MS. VAN DYKE:</p> <p>2 Q. And you believe they were treating you differently in</p> <p>3 this incident?</p> <p>4 A. Yes.</p> <p>5 Q. Why do you believe that?</p> <p>6 A. Because I don't think I -- I am almost 99 percent sure</p> <p>7 I did not do that. How could I -- how could the</p> <p>8 patient get all the way through with all the other</p> <p>9 nurses and doctors verifying the patient's name and</p> <p>10 date of birth and not be caught? It didn't get caught</p> <p>11 till radiology?</p> <p>12 Q. Do you know for sure that you didn't register this</p> <p>13 patient incorrectly?</p> <p>14 A. I can't go back on the system to find out if I did</p> <p>15 that or not. Don't have no access to that now.</p> <p>16 Q. Okay.</p> <p>17 A. Only management does.</p> <p>18 Q. All right. In terms of Ashley, is there anything</p> <p>19 else?</p> <p>20 A. No.</p> <p>21 Q. What about Renee? I know we've talked previously</p> <p>22 about some incidents with her, but is there anything</p> <p>23 else you can remember with Renee?</p> <p>24 A. Not at this time.</p> <p>25 Q. All right. With Ashley and this write-up, do you</p>	<p style="text-align: right;">Page 108</p> <p>1 this. Do these look familiar to you?</p> <p>2 A. Yeah.</p> <p>3 Q. Yeah. And, I'm sorry, we can scroll through all of</p> <p>4 them.</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Are these the handwritten notes that you would</p> <p>7 take?</p> <p>8 A. Yes.</p> <p>9 Q. All right. I don't want to be tedious here, but I am</p> <p>10 going to ask you to go through each of these just to</p> <p>11 make sure that we understand them and we're reading</p> <p>12 them correctly as well.</p> <p>13 So for this first page here -- and take all</p> <p>14 the time you need to re-read it. Who's this about?</p> <p>15 A. Trying to find the right --</p> <p>16 Okay. Hang on.</p> <p>17 So she started the -- at -- near the end for</p> <p>18 that paper.</p> <p>19 Q. Is there --</p> <p>20 A. Yeah. That's --</p> <p>21 So I have a date for August 19th, 2020.</p> <p>22 Q. Okay.</p> <p>23 A. And it goes for almost four pages.</p> <p>24 Q. All right. I think we have them out of order.</p> <p>25 Hold on. Let me go --</p>
<p style="text-align: right;">Page 107</p> <p>1 believe she was discriminating against you?</p> <p>2 MR. SHEAROUSE: I'm going to object, it calls</p> <p>3 for a legal conclusion, but go ahead and answer.</p> <p>4 A. I believe that they were being told to write me up.</p> <p>5 BY MS. VAN DYKE:</p> <p>6 Q. Who was telling them to write you up?</p> <p>7 A. Beaumont.</p> <p>8 Q. Who at Beaumont?</p> <p>9 A. Higher up.</p> <p>10 Q. And who is that?</p> <p>11 A. I don't know.</p> <p>12 Q. Do you know of other people who have been written up</p> <p>13 for registering a patient incorrectly?</p> <p>14 A. They don't talk -- I don't know. We don't talk about</p> <p>15 it.</p> <p>16 Q. All right. I'm going to pull up what we'll be marking</p> <p>17 as Exhibit Number 4.</p> <p>18 DEPOSITION EXHIBIT NUMBER 4</p> <p>19 WAS MARKED BY THE REPORTER</p> <p>20 FOR IDENTIFICATION</p> <p>21 BY MS. VAN DYKE:</p> <p>22 Q. There's --</p> <p>23 Hold on. I'm trying to see how many pages</p> <p>24 there are here.</p> <p>25 All right. So there's about 19 pages of</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Probably what it is because that's a different -- the</p> <p>2 green one is a different one.</p> <p>3 Q. Okay. Let me try and find this.</p> <p>4 So you believe it starts at August --</p> <p>5 A. It should be a yellow piece of paper, August 19th,</p> <p>6 2020. You should have all that.</p> <p>7 Q. All right. I'm not finding it.</p> <p>8 A. I see that.</p> <p>9 Q. Yeah. I think we have --</p> <p>10 A. It's not good.</p> <p>11 Q. -- only part. Okay. Hold on.</p> <p>12 MS. VAN DYKE: You know, Austen, can we go</p> <p>13 off the record for a second?</p> <p>14 MR. SHEAROUSE: Yes.</p> <p>15 (Recess taken at 1:52 p.m.)</p> <p>16 (Back on the record at 2:02 p.m.)</p> <p>17 MS. VAN DYKE: We are back on the record, and</p> <p>18 defendants have learned that we appear to be missing</p> <p>19 notes and some e-mails, and so we are going to get a</p> <p>20 summary over to plaintiff's counsel about what exactly</p> <p>21 we still need to continue this deposition with</p> <p>22 plaintiff, you know, and we won't put a date certain</p> <p>23 in there in terms of needing it before -- in advance</p> <p>24 of the second part of her deposition. And also</p> <p>25 plaintiff's counsel has agreed to look at Miss</p>

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<p style="text-align: right;">Page 110</p> <p>1 Miller's schedule and let us know when she's off next 2 so that we can continue the deposition itself. 3 And I don't know, Austen, if I've stated that 4 accurately or if you have any objections to what I 5 said. 6 MR. SHEAROUSE: Yeah. Yeah. As long as we 7 keep it within the -- I think we're only at like three 8 and a half hours, so keep it within the seven, and 9 I'll get that. As long as I get a little time to, you 10 know, ask some clarifying, I'm okay. 11 MS. VAN DYKE: Okay. That sounds good. So 12 we're all set here today, and then this is to be 13 continued. Thank you. 14 MR. SHEAROUSE: Okay. Thank you, Miss 15 Miller. You're free to go. 16 THE WITNESS: Thank you. 17 MS. VAN DYKE: Bye. 18 (The deposition was adjourned at 2:04 p.m. 19 Signature of the witness was not requested by 20 counsel for the respective parties hereto.) 21 * * * 22 23 24 25</p>	
<p style="text-align: right;">Page 111</p> <p>1 CERTIFICATE OF NOTARY 2 STATE OF MICHIGAN) 3) SS 4 COUNTY OF WAYNE) 5 I, Anne H. Chilton, Certified Shorthand Reporter, a 6 Notary Public in and for the above county and state, do 7 hereby certify that the above deposition was taken before me 8 at the time and place hereinbefore set forth; that the 9 witness was by me first duly sworn to testify to the truth, 10 and nothing but the truth, that the foregoing questions 11 asked and answers made by the witness were duly recorded by 12 me stenographically and reduced to computer transcription; 13 that this is a true, full, and correct transcript of my 14 stenographic notes so taken; and that I am not related to, 15 nor of counsel to either party, nor interested in the event 16 of this cause. 17 18 19 20 Anne H. Chilton, CSR-3669 21 Notary Public, 22 Wayne County, Michigan 23 My Commission expires: August 9, 2025 24 25</p>	

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHERYL MILLER,

Case No. 3:21-cv-12259

Plaintiff,

Hon. Robert H. Cleland

vs.

Magistrate Judge Anthony P. Patti

WILLIAM BEAUMONT HOSPITAL

dba BEAUMONT HEALTH

SYSTEM,

Defendant.

DEPONENT: SHERYL LYNN MILLER - Volume 2

DATE: Wednesday, April 5, 2023

TIME: 11:17 a.m.

LOCATION: Jackson Lewis P.C.

2000 Town Center, Suite 1650

Southfield, Michigan

REPORTER: Elizabeth G. LaBarge, CSR-4467

JOB NO: 23116

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 SHERYL MILLER,

6 Case No. 3:21-cv-12259

7 Plaintiff,

Hon. Robert H. Cleland

8 vs.

Magistrate Judge Anthony P. Patti

9
10 WILLIAM BEAUMONT HOSPITAL

11 dba BEAUMONT HEALTH

12 SYSTEM,

13
14 Defendant.
15
16
17

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Appearing on behalf of the Defendant.

Also Present: Roseanna Von Linsowe

Jennifer A. Zinn, Esq., via Zoom

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I N D E X

W I T N E S S

SHERYL LYNN MILLER

Examination by Ms. Van Dyke (Continued)

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
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	Date of Incident 1/13/21	128
Exhibit 7	Corrective Action Form - Date of	
	Incident 09/16/2021, 09/16/2021, and	
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Exhibit 8	Typewritten document and	
	Corrective Action Form - Date of	
	Incident 09/30/2022	136
Exhibit 9	Corrective Action Form - Date of	
	Incident 02/20/2022, and attachment . .	138

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Wednesday, April 5, 2023

Southfield, Michigan

11:17 a.m.

* * *

SHERYL LYNN MILLER

having been first duly sworn, was examined and

testified further as follows:

E X A M I N A T I O N (Continued)

BY MS. VAN DYKE:

Q Ms. Miller, we've met before at your first day of

deposition, and with me is Elyse Culberson, who works in

my office, and then we have Jennifer Zinn, who is the

in-house attorney with Beaumont, and then we have

Roseanna, who you know, as well.

If you need -- and I know we've gone over this

before, but if you need to take a break at any time,

please let me know and we can take a break.

A Okay.

Q So to continue this, I wanted to ask you about your

claim that you are suffering emotional distress --

A Um-hmm.

Q -- because of your work situation, and if you could

describe to me what stress, like how are your emotions

and your mental stability, whatever it may be, how

that's being affected?

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A By Beaumont harassing me and belittling me in front of

other employees, I had to help -- I had to seek mental

health.

Q And did you -- and you had to seek treatment?

A Yes.

Q And was that with LifeStance?

A Yes.

Q Did you seek treatment with anyone else?

A No.

Q What about your regular health care provider?

A I did see him first, he gave me the referral.

Q Okay. And at LifeStance, and I'm not going to go into

the records specifically here, but at LifeStance, who

have you seen, psychiatrists, psychologists?

A I've seen all, psychologists and psychiatrists.

Q Okay. Specifically, how has it affected you in terms of

anxiety or depression?

A Depression and anxiety, both, crying, nervous all the

time, multiple different emotions go on. Fear.

Q Have you had a prior history with depression before

this?

A I've had -- I've taken Xanax years ago.

Q And what about any anxiety issues prior to the work

incidents?

A No.

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<p style="text-align: right;">Page 117</p> <p>1 Q What medication are you currently on in terms of any 2 anxiety or depression meds? 3 A I'm on Buspar, Seroquel, Prozac, Xanax. 4 Q I've got Buspar, Prozac, Xanax, and what was the other 5 one? 6 A Seroquel. 7 Q What type of medication is that? 8 A It's also an antidepressant. It's strong, he's trying 9 to get me off one of the other -- one or two of the 10 other medications. 11 Q Trying to get you off of Prozac and -- 12 A Either Prozac or Buspar, I don't remember. 13 Q And when did you start taking the Buspar? 14 A A while back, I don't know the exact date. 15 Q What about the Prozac? 16 A They were both given to me around the same time. 17 Q And Xanax, the same? 18 A Xanax I was already getting from my primary and then he 19 told me to seek other help. 20 Q Okay. And the Seroquel? 21 A That just started a few months ago. 22 Q Have you noticed a difference with the Seroquel? 23 A It does help a little. 24 Q Do you have any hobbies outside of work? 25 A I just do crafts, but I haven't done them in a long</p>	<p style="text-align: right;">Page 119</p> <p>1 were for N-95 masks? 2 A The guidelines were anybody with a existing disability 3 was allowed to wear N-95 masks. 4 Q And did you have yours -- did you have your N-95 mask 5 fitted? 6 A No, Beaumont never offered. 7 Q Did you ever have them disinfected? 8 A They were -- you throw them away after you're done. 9 Q How often would you throw them away? 10 A Every day. 11 Q Did you have enough masks for every day? 12 A Not -- 13 Q N-95s, in March -- 14 A In March, no, because I wasn't there very long. I mean, 15 Beaumont was giving them to us until we were told we 16 were never -- no longer allowed to use them. 17 Q When you returned to work in July, what type of mask did 18 you start wearing then? 19 A N-95. 20 Q In July? Who was providing those? 21 A I got them from my husband, his work. 22 Q And were you -- so you were allowed to wear your own in 23 July? 24 A When I came back finally, yes. 25 Q Do you know why you were allowed to wear it in July, but</p>
<p style="text-align: right;">Page 118</p> <p>1 time. 2 Q All right. So when we last spoke, you indicated that 3 you had N-95 masks, and this was around March of 2020 4 when the pandemic first hit? 5 A Oh, N-95 masks. 6 Q Yep. 7 A Well, yes, I had it. 8 Q Okay. Were you able to find any Amazon receipts for 9 those masks? 10 A No. 11 Q And you said that your husband also provided you with 12 masks? 13 A Yes. 14 Q Okay. 15 A From work. 16 Q Was his employer aware that he was providing masks? 17 A Yes. They told him to -- that it was okay for him to 18 bring them home for his -- for the families. 19 Q How many masks did you have? 20 A By then or you mean after I came back? 21 Q By then, in March of 2020. 22 A I had -- at that time, I -- he had just started getting 23 them his self, so those, I only had a -- I had a few 24 here and there of his. 25 Q Okay. Do you recall at the time what the guidelines</p>	<p style="text-align: right;">Page 120</p> <p>1 not in March? 2 A No. 3 Q In March -- 4 A I -- 5 Q Sorry, go ahead. 6 A I'm sorry, I was thinking, because it's been so long. 7 Also, you were only supposed to wear N-95 when you were 8 near the patient, they claimed, but yet you -- there was 9 a real funny thing going on with that, how they made it 10 sound, so... 11 Q With the guidelines or the hospital policy? 12 A The policy of the hospital. 13 Q Do you know if the guidelines were changing, the CDC 14 guidelines, at the time in March? 15 A In March? I don't know, I wasn't there. 16 Q Before you went on your FMLA leave related to this, to 17 the mask issue, were you provided with gowns, gloves, 18 anything else? 19 A We were offered gloves. The gowns were for the nurses 20 and doctors. 21 Q Was there a shortage of gowns, if you know? 22 A I don't know. 23 Q Did you have any plastic barriers or face shields at 24 all? 25 A They offered them.</p>

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<p style="text-align: right;">Page 121</p> <p>1 Q Did you use one?</p> <p>2 A A face shield?</p> <p>3 Q Yes.</p> <p>4 A They weren't going to protect me, it was airborne.</p> <p>5 Q What about like did they offer plastic barriers?</p> <p>6 A Between me and them?</p> <p>7 Q Yeah.</p> <p>8 A No.</p> <p>9 Q Going back to March of 2020, were you working directly</p> <p>10 with COVID patients?</p> <p>11 A Yes.</p> <p>12 Q And when was that?</p> <p>13 A When we would have -- in admitting them to the system.</p> <p>14 Q Can you explain what you just said?</p> <p>15 A Well, I'm registration, so the nurses would hand us</p> <p>16 their stuff, all gowned up, open the door and hand it to</p> <p>17 us, while the patient is still sitting there hacking and</p> <p>18 coughing.</p> <p>19 Q Were the patients -- were the COVID patients put in</p> <p>20 isolation rooms?</p> <p>21 A They were considered isolation rooms, but for us, when</p> <p>22 they opened the door, they basically contaminated us</p> <p>23 instead of sliding it under the door like they were</p> <p>24 supposed to do.</p> <p>25 Q Okay. And so could you describe the setup to me, what</p>	<p style="text-align: right;">Page 123</p> <p>1 A That's what I'm saying, we were in the one room, they</p> <p>2 were in the other room, and they would open -- the</p> <p>3 nurses would open the doors. We would only have -- we</p> <p>4 would only have that little paper mask on with gloves.</p> <p>5 Q Did you double up on your mask, the surgical mask?</p> <p>6 A No.</p> <p>7 Q The patients -- so were you dealing differently with the</p> <p>8 patients who did not have COVID symptoms?</p> <p>9 A I couldn't tell who had it and who had not, I'm not a</p> <p>10 doctor.</p> <p>11 Q Okay. But was there a procedure at the time where</p> <p>12 patients not experiencing COVID symptoms could deal with</p> <p>13 you directly for registration?</p> <p>14 A They didn't have a -- I don't -- I don't remember which</p> <p>15 way they went in, to tell you the honest truth. They</p> <p>16 kept complaining that they all had COVID, so...</p> <p>17 Q How long did you wear the N-95 mask for after you came</p> <p>18 back in July?</p> <p>19 A I don't know. Over a year.</p> <p>20 Q So about until about July 2021?</p> <p>21 A Probably near the end.</p> <p>22 Q Okay. Did you start wearing surgical masks then?</p> <p>23 A When they finally got it under control, yes.</p> <p>24 Q Do you currently wear a surgical mask?</p> <p>25 A Yes. And if somebody has COVID and I know it as they</p>
<p style="text-align: right;">Page 122</p> <p>1 room were you in and where were the patients?</p> <p>2 A Okay. So they have a clean room, they call it, I do</p> <p>3 believe, and then they had another room, and they had</p> <p>4 us -- I don't know what room that was considered, but it</p> <p>5 looked like a little office. So there was a door in</p> <p>6 between. They were supposed to be sliding everything</p> <p>7 underneath the door; they were not. The nurse would</p> <p>8 open the door, hand us the information, and then turn</p> <p>9 around and take the stuff, open the door again and give</p> <p>10 it back to us, would take the stuff and put wristbands</p> <p>11 on or whatever, and then that was during -- that was</p> <p>12 just when it just started, so people weren't actually</p> <p>13 staying in the hospital unless they were deathly sick.</p> <p>14 Q Were people, did they start doing outdoor screening of</p> <p>15 patients before they were let into the hospital, do you</p> <p>16 know?</p> <p>17 A It's been a while. I know they did do that. I don't</p> <p>18 know if I was there when they started doing that.</p> <p>19 Q And were you dealing directly with patients, as well?</p> <p>20 A I was at times when I was put in triage.</p> <p>21 Q And were those patients with COVID symptoms or patients</p> <p>22 without COVID symptoms?</p> <p>23 A Both.</p> <p>24 Q And when you were working in triage, how were you</p> <p>25 interacting with the patients with COVID symptoms?</p>	<p style="text-align: right;">Page 124</p> <p>1 come in, they tell us, I wear an N-95 also.</p> <p>2 Q Do they give you like a heads-up, so to speak, or the</p> <p>3 warning that this person has COVID symptoms?</p> <p>4 A No, the patient does.</p> <p>5 Q When they describe their symptoms?</p> <p>6 A Um-hmm.</p> <p>7 Q Okay.</p> <p>8 (Clarification requested by court reporter.)</p> <p>9 BY MS. VAN DYKE:</p> <p>10 Q Oh, sorry. Is that yes?</p> <p>11 A Yes.</p> <p>12 MR. SHEAROUSE: Yeah, just a quick reminder. When</p> <p>13 you answer, I know we sometimes nod or -- make sure you</p> <p>14 give a verbal so that she can record it.</p> <p>15 THE WITNESS: Sorry.</p> <p>16 MR. SHEAROUSE: It happens.</p> <p>17 BY MS. VAN DYKE:</p> <p>18 Q When the patient describes COVID symptoms, do you then</p> <p>19 switch your mask out with the N-95?</p> <p>20 A Yes.</p> <p>21 Q Do you recall any communications from any of the</p> <p>22 supervisors or managers about wearing your own N-95 mask</p> <p>23 in March, like February, March of 2020?</p> <p>24 A Do I know anybody who -- please rephrase.</p> <p>25 Q Yes, yes. Do you recall receiving any communications</p>

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<p style="text-align: right;">Page 125</p> <p>1 from the hospital or managers about bringing in your own</p> <p>2 N-95 masks?</p> <p>3 A There was no communication, there was argument.</p> <p>4 Q Argument?</p> <p>5 A Um-hmm.</p> <p>6 Q Okay. And what was that argument?</p> <p>7 A It was over me bringing in my own N-95s.</p> <p>8 Q And who were you arguing with?</p> <p>9 A Roseanne.</p> <p>10 Q And what did you say specifically?</p> <p>11 A She told me -- she sent an email out, she told everybody</p> <p>12 Beaumont stated that they did not think that we needed</p> <p>13 N-95s because they claimed we weren't close enough to</p> <p>14 the patients. And then I went to her and I told her I</p> <p>15 have asthma with COPD and that I have different</p> <p>16 underlying conditions, and she said that</p> <p>17 they -- Beaumont said I could not wear it, so I was not</p> <p>18 allowed to wear it. And she asked for all the new ones</p> <p>19 back for the medical staff.</p> <p>20 Q I'm going to show you what I'm marking as Exhibit</p> <p>21 Number 5.</p> <p>22 (Exhibit 5 marked for identification.)</p> <p>23 BY MS. VAN DYKE:</p> <p>24 Q Take a moment to read this. Exhibit Number 5 discusses</p> <p>25 having to return the N-95 masks. Is this what you're</p>	<p style="text-align: right;">Page 127</p> <p>1 A Yes.</p> <p>2 Q Who?</p> <p>3 A Adriana Shelley.</p> <p>4 Q Adriana Shelley, okay. And do you know why she left?</p> <p>5 A Because she also had asthma and Beaumont refused to let</p> <p>6 her have an N-95 also.</p> <p>7 Q And how do you know that?</p> <p>8 A She told me. And I know that's what they did to me.</p> <p>9 Q Do you know of other people who went on leaves, a leave</p> <p>10 of absence, at the pandemic?</p> <p>11 A Not that I'm aware of.</p> <p>12 Q When we spoke last time, you described some incidents</p> <p>13 that you claim were harassing.</p> <p>14 A Yes.</p> <p>15 Q One was the investigation, correct?</p> <p>16 A Which one?</p> <p>17 Q How many investigations have there been?</p> <p>18 A There's been -- I've been through many of them, a lot.</p> <p>19 Q Okay. So let's take them one by one then. The</p> <p>20 investigation I was referring to was the one you</p> <p>21 described where they looked into whether you were going</p> <p>22 into patients' charts.</p> <p>23 A Yes.</p> <p>24 Q What are the other investigations?</p> <p>25 A Well, that was the big investigation. I'm talking about</p>
<p style="text-align: right;">Page 126</p> <p>1 referring to, if you know?</p> <p>2 A Basically, yeah, that's part of it, yes.</p> <p>3 Q Okay. And so what happened, was it because there was a</p> <p>4 short supply of them at the time?</p> <p>5 A I guess.</p> <p>6 Q And did you receive an N-95 mask at that time?</p> <p>7 A Prior to that?</p> <p>8 Q Yes.</p> <p>9 A They gave us some, but then they had us take them back,</p> <p>10 we had to give them back to them.</p> <p>11 Q Okay. And do you know who was requiring them to be</p> <p>12 returned?</p> <p>13 A Per Roseanne, Beaumont.</p> <p>14 Q All right. At this time and going back to March of</p> <p>15 2020, do you know of any patient registration staff</p> <p>16 members who were allowed to wear an N-95 mask?</p> <p>17 A I don't know, I didn't pay attention to anybody else.</p> <p>18 Oh. Well, I mean, a couple might have, I mean, I</p> <p>19 don't -- I worry about myself.</p> <p>20 Q So you don't remember any of the patient registration</p> <p>21 members being able to wear an N-95 in March of 2020?</p> <p>22 A A lot of them chose not to, they -- because they did not</p> <p>23 have asthma and allergies.</p> <p>24 Q Do you know of anyone who left their employment at the</p> <p>25 hospital at the beginning of the pandemic?</p>	<p style="text-align: right;">Page 128</p> <p>1 the harassment, how they're always trying to find</p> <p>2 something to write me up about.</p> <p>3 Q Okay, so we'll take it step by step. And are you</p> <p>4 referring to the corrective actions you received?</p> <p>5 A The ones that they -- that I refused to sign, yes.</p> <p>6 Q Okay.</p> <p>7 A Because I don't agree with them.</p> <p>8 Q I'm going to hand you what I'm marking as Exhibit 6.</p> <p>9 (Exhibit 6 marked for identification.)</p> <p>10 MS. VAN DYKE: I only ask that at the end of this,</p> <p>11 we get these exhibits back.</p> <p>12 MR. SHEAROUSE: Oh, sure.</p> <p>13 MS. VAN DYKE: I've had many people take them</p> <p>14 sometimes.</p> <p>15 THE WITNESS: Okay.</p> <p>16 BY MS. VAN DYKE:</p> <p>17 Q Is this one of the incidents you're claiming was</p> <p>18 harassing?</p> <p>19 A Yes.</p> <p>20 Q Okay. And here, can you explain to me what happened?</p> <p>21 And this is a Corrective Action Form with the date of</p> <p>22 the incident being January 13th, 2021.</p> <p>23 A They claimed I had banded the wrong patient and I</p> <p>24 claimed that the clerk did it and I told her I did not</p> <p>25 do that.</p>

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<p style="text-align: right;">Page 129</p> <p>1 Q Do you know if you didn't?</p> <p>2 A I double-check my work all the time.</p> <p>3 Q Do you have any evidence or proof to support that you</p> <p>4 actually banded the correct patient?</p> <p>5 A No, it's illegal to take any -- the patient's</p> <p>6 information or take pictures or any of that.</p> <p>7 Q And who was the one who issued you the discipline on</p> <p>8 this?</p> <p>9 A That was Beth.</p> <p>10 (Clarification requested by court reporter.)</p> <p>11 BY MS. VAN DYKE:</p> <p>12 Q And that's Beth Karr, K-a-r-r?</p> <p>13 A Yes.</p> <p>14 Q Do you know who caught the alleged misbanding?</p> <p>15 A According to this, the imaging clerk.</p> <p>16 Q And that would have -- so this patient would have been</p> <p>17 sent to imaging. Is that like an X-ray or --</p> <p>18 A Yes.</p> <p>19 Q Okay.</p> <p>20 A X-ray, ultrasound.</p> <p>21 Q Do you know which imaging clerk it was?</p> <p>22 A No. They don't give me that information.</p> <p>23 MS. VAN DYKE: I'm going to hand you Exhibit 7</p> <p>24 now.</p> <p>25 (Exhibit 7 marked for identification.)</p>	<p style="text-align: right;">Page 131</p> <p>1 A Jennifer.</p> <p>2 Q Jennifer, what's the last name?</p> <p>3 A White. I think her last name was White, I'd have to</p> <p>4 look.</p> <p>5 Q Okay.</p> <p>6 A She's not with us no more.</p> <p>7 Q Who was Jennifer White at the time?</p> <p>8 A She was a manager or -- I don't know if she's supervisor</p> <p>9 or manager, to tell you the truth. It was after Beth</p> <p>10 was gone.</p> <p>11 Q All right. Did you claim that you banded the correct</p> <p>12 patient?</p> <p>13 A Yes, I did band the correct patient.</p> <p>14 Q All right. And how do you know that?</p> <p>15 A Because I know I did.</p> <p>16 Q And how?</p> <p>17 A Because I double-check my work.</p> <p>18 Q Do you know who complained that the patient was</p> <p>19 misbanded?</p> <p>20 A No.</p> <p>21 Q Is that -- on the first page, it says Gen RAD. Is that</p> <p>22 radiation?</p> <p>23 A On the first page?</p> <p>24 Q First page, yeah, right there.</p> <p>25 A That just means general radiology.</p>
<p style="text-align: right;">Page 130</p> <p>1 BY MS. VAN DYKE:</p> <p>2 Q Here, take your time to look over this one.</p> <p>3 A Oh.</p> <p>4 Q Did you have a chance to look it over?</p> <p>5 A Yeah, I see it.</p> <p>6 Q What about -- did you look over all the pages? There's</p> <p>7 three pages. The third page, as well.</p> <p>8 So this is a Corrective Action Form with incidents</p> <p>9 on September 16th, 2021.</p> <p>10 A Um-hmm.</p> <p>11 Q And the first incident is that you misbanded a patient</p> <p>12 and used someone else's information. And then the</p> <p>13 second incident is that you put in an order for the</p> <p>14 wrong -- the incorrect hip. I want to ask you about</p> <p>15 that third page here because it -- did you submit this</p> <p>16 third page to the hospital or did you keep this for your</p> <p>17 own?</p> <p>18 A This is from my own notes.</p> <p>19 Q Okay. And did you type up these notes on that day?</p> <p>20 A Yes.</p> <p>21 Q So it would have been the October 4th day that you typed</p> <p>22 it up?</p> <p>23 A Yes.</p> <p>24 Q And when the discipline was issued to you, do you know</p> <p>25 who issued it?</p>	<p style="text-align: right;">Page 132</p> <p>1 Q Radiology?</p> <p>2 A Yes.</p> <p>3 Q Okay. And then as far as the hip, putting in the order</p> <p>4 for the wrong hip, do you know if you did that?</p> <p>5 A So here's the thing when it comes to that. Everybody</p> <p>6 does do the wrong hip, but when it gets down to</p> <p>7 radiology, they fix it if it's incorrect, they don't</p> <p>8 make a big fuss of it, everybody used to do it all the</p> <p>9 time. It's just that they decided to try to write me up</p> <p>10 for this.</p> <p>11 Q Do you know if you were written up for it because</p> <p>12 radiology also believed you banded the wrong patient, if</p> <p>13 you know?</p> <p>14 A I don't know what radiology thinks.</p> <p>15 Q Do you know of other people in patient registration who</p> <p>16 have banded wrong patients or have been alleged to band</p> <p>17 the wrong patient and were not disciplined?</p> <p>18 A Yes.</p> <p>19 Q Who?</p> <p>20 A Everyone in the department, everybody has done it once</p> <p>21 or twice. Or even multiple times.</p> <p>22 Q Okay. But who specifically?</p> <p>23 A I don't know all their names.</p> <p>24 Q Do you know of one or two people?</p> <p>25 A I was informed there was a few of them, there</p>

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<p style="text-align: right;">Page 133</p> <p>1 was -- there was girls from -- it's been over two years.</p> <p>2 They claim that Kristen did it. They had claimed</p> <p>3 that other people that -- I don't remember which names,</p> <p>4 I mean, everybody's done it.</p> <p>5 Q Who is Kristen, was she another patient registration?</p> <p>6 A At one point, yes.</p> <p>7 Q Do you recall her last name?</p> <p>8 A No.</p> <p>9 Q And when you say they claim that Kristen did it, who is</p> <p>10 "they"?</p> <p>11 A The other girls.</p> <p>12 Q And who was that? So you're saying someone told you</p> <p>13 Kristen misbanded someone?</p> <p>14 A Yeah. And I've also heard other people say, "I banded</p> <p>15 the wrong patient."</p> <p>16 Q And who is that?</p> <p>17 A I don't know their -- I don't know who said it, they all</p> <p>18 say it.</p> <p>19 Q Do you know how it was brought to anyone's attention</p> <p>20 that they banded the wrong patient?</p> <p>21 A How it was brought to whose attention?</p> <p>22 Q The people you're claiming, everyone, apparently.</p> <p>23 A Was it brought to the management or to --</p> <p>24 Q Yeah, to --</p> <p>25 A -- us?</p>	<p style="text-align: right;">Page 135</p> <p>1 unfairly?</p> <p>2 A Because I turned them in to the EEOC.</p> <p>3 Q What did you turn in to the EEOC?</p> <p>4 A How they would not allow me to have N-95 masks.</p> <p>5 Q And who was it specifically that wouldn't allow you to</p> <p>6 have the N-95?</p> <p>7 A Beaumont and Roseanne.</p> <p>8 Q But what about Beth?</p> <p>9 A Beth was gone during that time.</p> <p>10 Q So are you saying that Beth treated you unfairly other</p> <p>11 than this corrective action we went over, are there any</p> <p>12 other incidents where Beth treated you unfairly?</p> <p>13 A Not that I'm aware of at this point that I can think of.</p> <p>14 Q What about Shauna?</p> <p>15 A No.</p> <p>16 Q You said Katie?</p> <p>17 A She was my first manager when I first got hired,</p> <p>18 transferred to there.</p> <p>19 Q Did she treat you unfairly about anything?</p> <p>20 A No.</p> <p>21 Q And then you mentioned an Ashley?</p> <p>22 A She's my manager right now, or supervisor.</p> <p>23 Q All right. Are you --</p> <p>24 A Ashley or Renee are my supervisors as of right now.</p> <p>25 Q Are you making any claims against Ashley or Renee?</p>
<p style="text-align: right;">Page 134</p> <p>1 Q Was it brought to management's attention that they</p> <p>2 misbanded?</p> <p>3 A Yeah, because they were pulled in the office. They</p> <p>4 would tell other people.</p> <p>5 Q Who pulled them in the office?</p> <p>6 A Management pulled those employees into the office and</p> <p>7 then the employees come out and say what happened.</p> <p>8 Q Do you know if those employees were disciplined?</p> <p>9 A I don't know.</p> <p>10 Q And at the time, who was in management, who are you</p> <p>11 referring to? Because I know you've had different</p> <p>12 supervisors.</p> <p>13 A It was Beth, it was Roseanne, it was Shauna, there</p> <p>14 was -- prior -- there was a Katie, there was</p> <p>15 a -- there's Ashley and Renee and then there was</p> <p>16 Jennifer, I mean, there's a bunch of managements.</p> <p>17 Q All right. Are you alleging that Beth treated you</p> <p>18 unfairly, Beth Karr?</p> <p>19 A I believe she was pushed higher up.</p> <p>20 Q And who is higher up?</p> <p>21 A Her manager.</p> <p>22 Q And who is that?</p> <p>23 A I don't know her manager's name at that time.</p> <p>24 Q Why do you -- so starting with Beth, why do you believe</p> <p>25 that she was pushed from higher up to treat you</p>	<p style="text-align: right;">Page 136</p> <p>1 A That they have -- I have mentioned it in there that they</p> <p>2 were harassing me, yes.</p> <p>3 Q And how were they harassing you?</p> <p>4 A Also would write me up.</p> <p>5 Q Okay. I'm going to hand you what I'm marking as</p> <p>6 Exhibit 8.</p> <p>7 (Exhibit 8 marked for identification.)</p> <p>8 BY MS. VAN DYKE:</p> <p>9 Q Take some time to read it.</p> <p>10 A Oh.</p> <p>11 Q Is this what you're referring to with Ashley and Renee?</p> <p>12 A This is one of them.</p> <p>13 Q Okay. And this is a write-up for September 30th, 2022?</p> <p>14 A Um-hmm.</p> <p>15 Q So this is for leaving your station without notifying</p> <p>16 leadership. Do you know of others who have been written</p> <p>17 up for leaving their station unattended?</p> <p>18 A No.</p> <p>19 Q And do you know who in clinical staff and triage</p> <p>20 complained?</p> <p>21 A No, all I know is they claimed it was a nurse.</p> <p>22 Q A nurse complained? You don't know which nurse?</p> <p>23 A No.</p> <p>24 Q Do you know of people who have left their station and</p> <p>25 were not disciplined and left their station without</p>

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<p style="text-align: right;">Page 137</p> <p>1 notifying management?</p> <p>2 A A lot of people do, but --</p> <p>3 Q You believe that --</p> <p>4 A -- there was something else going on there that day,</p> <p>5 it's not just me leaving the station.</p> <p>6 Q What happened?</p> <p>7 A I was sick that day and they knew it. Okay? They knew</p> <p>8 I was sick. And I was running back and forth to the</p> <p>9 bathroom and they can see me going back and forth, and I</p> <p>10 told the nurses I had to run to the bathroom, that's</p> <p>11 what I did. So I ran to the bathroom and at the same</p> <p>12 time, apparently an EMS came in, so one of my co-workers</p> <p>13 had to go cover for me. It was either get sick in front</p> <p>14 of the patients or run to the bathroom.</p> <p>15 Q Did you ask to leave work that day?</p> <p>16 A Yes, I did.</p> <p>17 Q Did you leave after this?</p> <p>18 A No. They told me if I did, I would be written up.</p> <p>19 Q If you left work?</p> <p>20 A Yes.</p> <p>21 Q And who told you that you'd be written up if you left</p> <p>22 work?</p> <p>23 A Renee.</p> <p>24 Q Is this Renee Labo?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 139</p> <p>1 A No, I did not touch a Hospice if I was working in</p> <p>2 triage.</p> <p>3 Q So a Hospice patient wouldn't come to you in triage?</p> <p>4 A No, he goes straight to the back.</p> <p>5 Q What's the back, what's in the back?</p> <p>6 A That's in the department where registration works and</p> <p>7 they do the completion of the charts before they are</p> <p>8 discharged. Or before the doctor can discharge them.</p> <p>9 Q So it looks like an error was found with the patient</p> <p>10 registration at imaging?</p> <p>11 A Yes, they claim.</p> <p>12 Q And do you contest this or do you not agree with this?</p> <p>13 A I do not agree with it.</p> <p>14 Q And why is that again?</p> <p>15 A I don't believe it's true. I double-check my work. I</p> <p>16 have a patient spell me their name, give me their date</p> <p>17 of birth, I verify it by their soc -- last four of their</p> <p>18 social or address that they have on file.</p> <p>19 Q So with this, the supervisors show Ashley and Renee.</p> <p>20 Are you claiming that they have harassed you in any</p> <p>21 other way other than the corrective actions we just went</p> <p>22 over?</p> <p>23 A They're always watching me all the time.</p> <p>24 Q Okay. And what do you mean by watching you?</p> <p>25 A They're -- they make me very, very nervous, every time</p>
<p style="text-align: right;">Page 138</p> <p>1 Q Who is -- oh. Renee Carr?</p> <p>2 A Renee Carr, with a C.</p> <p>3 Q Okay. I'm going to hand you what I'm marking, as well,</p> <p>4 Exhibit 9.</p> <p>5 (Exhibit 9 marked for identification.)</p> <p>6 BY MS. VAN DYKE:</p> <p>7 Q Here's the official copy. This is a corrective action</p> <p>8 from February 20th, 2022, and this is for registering a</p> <p>9 patient incorrectly.</p> <p>10 Who issued this to you?</p> <p>11 A This is Teri Knight.</p> <p>12 Q Okay. Can you tell who the supervisor is who signed</p> <p>13 this?</p> <p>14 A Yes, it's Teri Knight. Oh, the supervisor?</p> <p>15 Q Yeah, the signature above Teri's?</p> <p>16 A I think it's Ashley Fields.</p> <p>17 Q Okay.</p> <p>18 A I do believe.</p> <p>19 Q All right. And did you read what the write-up was for?</p> <p>20 A Yep.</p> <p>21 Q Okay. And are you claiming that this was harassing?</p> <p>22 A Yes, because it's -- first they're saying it was an</p> <p>23 emergency, then they're telling me it was in Hospice. I</p> <p>24 never touched a Hospice.</p> <p>25 Q What do you mean, that you've never touched a Hospice?</p>	<p style="text-align: right;">Page 140</p> <p>1 they close their doors, I believe they're talking about</p> <p>2 me because of all of this been going on for years.</p> <p>3 Q And why do you believe they're talking about you?</p> <p>4 A Because I'm always harassed like this and being told</p> <p>5 that I did something when I know I did not.</p> <p>6 Q Okay. So do you have any specific reason to believe</p> <p>7 that they're talking about you behind closed doors?</p> <p>8 A Because this is always happening all the time.</p> <p>9 Q Well, we have two corrective actions. Have there been</p> <p>10 more?</p> <p>11 A No.</p> <p>12 Q Okay. How long have they been your supervisors for?</p> <p>13 A Teri?</p> <p>14 Q Yeah, or Ashley.</p> <p>15 A Ashley? Over a year, I do believe.</p> <p>16 Q Okay. And what about Renee Carr?</p> <p>17 A It's the same. It might be two years, I don't know</p> <p>18 exactly how long they've been.</p> <p>19 Q So I believe you said no, but other than these two</p> <p>20 write-ups, have you received other write-ups from them?</p> <p>21 A Not recently.</p> <p>22 Q So the last one is the February 20th, 2022?</p> <p>23 A I do believe.</p> <p>24 Q Okay. Did management from the hospital ever state that</p> <p>25 they were concerned about fake N-95 masks?</p>

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<p style="text-align: right;">Page 141</p> <p>1 A Fake N-95s?</p> <p>2 Q Yes.</p> <p>3 A Never heard of it.</p> <p>4 Q Okay. What about people not being fitted properly or</p> <p>5 not disinfecting them properly, was that ever discussed?</p> <p>6 A No, I didn't have a -- I didn't get one of those</p> <p>7 respirators, if that's what you're talking about. I</p> <p>8 requested one. I never got one.</p> <p>9 Q What is -- what respirator are you talking about?</p> <p>10 A A respirator is one where you have to disinfect it and</p> <p>11 reuse it. It's like a -- kind of like a gas mask.</p> <p>12 Q It's different than the N-95?</p> <p>13 A Yes.</p> <p>14 Q Okay.</p> <p>15 A It gives you more protection.</p> <p>16 Q All right. Did you request one?</p> <p>17 A Yes.</p> <p>18 Q When did you request it?</p> <p>19 A When Beth was there.</p> <p>20 Q Beth? About what date or what month and year, if you</p> <p>21 recall?</p> <p>22 A I don't know what month and year, I'd have to look at my</p> <p>23 papers.</p> <p>24 Q Do you know of others who received them?</p> <p>25 A In my department?</p>	<p style="text-align: right;">Page 143</p> <p>1 A Not that close in contact with patients.</p> <p>2 Q Okay.</p> <p>3 A Because they would have to give me their ID.</p> <p>4 Q Is this when they were screening patients for COVID</p> <p>5 symptoms?</p> <p>6 A They were screening for COVID symptoms for a long time,</p> <p>7 but in the beginning, yes.</p> <p>8 Q And is this when the patients with COVID symptoms were</p> <p>9 put in the other room?</p> <p>10 A Well, I'm trying to figure out which one you're trying</p> <p>11 to ask me.</p> <p>12 Q Sure. So you're saying that you didn't want to be in</p> <p>13 triage because you didn't want to deal with patients?</p> <p>14 A When it first started, yes.</p> <p>15 Q Okay.</p> <p>16 A When it first started, we had no idea what was going on</p> <p>17 with this disease, I did not want to be in triage</p> <p>18 because of my underlying condition, and Beaumont, I was</p> <p>19 told that I still had to work out there and to just wear</p> <p>20 a paper mask and I would be just fine.</p> <p>21 Q When was this?</p> <p>22 A This is before -- right before I went on medical leave.</p> <p>23 Q Do you know what the CDC guidelines were at the time?</p> <p>24 A According to Beaumont or according to the country?</p> <p>25 Q We'll start with Beaumont.</p>
<p style="text-align: right;">Page 142</p> <p>1 Q Correct.</p> <p>2 A No.</p> <p>3 Q Do you know how many were available?</p> <p>4 A Ten.</p> <p>5 Q Ten?</p> <p>6 A Per Beth, she sent an email out.</p> <p>7 Q Do you know if it was first come, first served?</p> <p>8 A She told me to put a request in and she would get me</p> <p>9 fitted, and it never came through and it -- that was the</p> <p>10 end of it.</p> <p>11 Q Do you know why?</p> <p>12 A No, I was never informed why.</p> <p>13 Q When you requested the N-95 in the beginning of the</p> <p>14 pandemic -- I know we're jumping around here -- did you</p> <p>15 make any other requests for an accommodation or was it</p> <p>16 just the N-95 mask?</p> <p>17 A The N-95. We were already allowed to have gloves. And</p> <p>18 I did not want to work out in triage, I did request not</p> <p>19 to work out in triage.</p> <p>20 Q And what happened with that request?</p> <p>21 A I could stay in the back, but I still had to go to the</p> <p>22 patient's room to do still registration, so I was still</p> <p>23 in contact with the patients.</p> <p>24 Q Okay. So your request was not to work in triage so you</p> <p>25 wouldn't be in contact with --</p>	<p style="text-align: right;">Page 144</p> <p>1 A According to Beaumont, I was supposed to be fine because</p> <p>2 they claimed I wasn't close enough. But according to</p> <p>3 the Government, if you had a underlying existing</p> <p>4 condition, you should be wearing a N-95 and it should be</p> <p>5 supplied to your employees.</p> <p>6 Q Are you aware of the N-95 shortage at some point?</p> <p>7 A Yes.</p> <p>8 Q Okay. And what do you know about that?</p> <p>9 A All I know is that there was a little bit of a shortage</p> <p>10 and they were making them from all different kind of</p> <p>11 factories.</p> <p>12 Q Okay. What about -- like the auto manufacturers started</p> <p>13 making them?</p> <p>14 A Yeah, yeah.</p> <p>15 Q Do you know if Beaumont had a shortage of masks?</p> <p>16 A I do not know.</p> <p>17 Q I want to go through some of your witnesses here to see</p> <p>18 what they know of, and one is Roseanne. What knowledge</p> <p>19 does she have of your claims?</p> <p>20 A Of what? Which thing?</p> <p>21 Q Exact -- yeah, that's what I'm asking. So is</p> <p>22 it -- you've mentioned her in terms of the N-95 mask.</p> <p>23 A Okay.</p> <p>24 Q Is there anything else, like any discipline?</p> <p>25 A Yes.</p>

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<p style="text-align: right;">Page 145</p> <p>1 Q Okay. What discipline is that?</p> <p>2 A She has belittled me in front of other employees. She</p> <p>3 had done -- she was always correcting me on everything I</p> <p>4 did. I did everything right and it still was not good</p> <p>5 enough, but yet the next person next to me, she would go</p> <p>6 ahead and let it -- and say, "Oh, that's okay." She had</p> <p>7 favors, favorites.</p> <p>8 Q Who were her favorites?</p> <p>9 A There was a lot of them back then. I don't know</p> <p>10 exactly.</p> <p>11 Q Can you think of any?</p> <p>12 A She never -- she never bothered Mary or --</p> <p>13 Q Who was that? I'm sorry.</p> <p>14 A Mary.</p> <p>15 Q Mary, okay.</p> <p>16 A She didn't bother Tina, she didn't bother Pam, she</p> <p>17 didn't bother any of them.</p> <p>18 Q And what do you mean, didn't bother?</p> <p>19 A She would not yell at any of them for the same exact</p> <p>20 thing as she claimed I was doing wrong, but I was not</p> <p>21 doing nothing wrong.</p> <p>22 Q So what did she claim you were doing wrong?</p> <p>23 A It's been three years, I don't know exactly which time</p> <p>24 we're talking about.</p> <p>25 Q Well, did she write you up for anything?</p>	<p style="text-align: right;">Page 147</p> <p>1 registering patients fast enough?</p> <p>2 A I don't know -- I don't know who would have complained</p> <p>3 about it, I worked by myself down there. I registered</p> <p>4 between 80 to 90 patients, if not more, a day by myself.</p> <p>5 Q And this was on the day shift?</p> <p>6 A Yes.</p> <p>7 Q Do you know if anyone may have complained from the</p> <p>8 afternoon shift?</p> <p>9 A There was no afternoon shift for that.</p> <p>10 Q Okay. It just closed --</p> <p>11 A Yeah, after three --</p> <p>12 Q -- the center closed?</p> <p>13 A After 3:30, it closed.</p> <p>14 Q Okay. Do you know if any patients complained?</p> <p>15 A I don't know.</p> <p>16 Q You list Monica Holbrook?</p> <p>17 A Yes.</p> <p>18 Q And she is -- was one of your FMLA leave people; is that</p> <p>19 correct?</p> <p>20 A Yes, she was a -- she basically either approves or</p> <p>21 disapproves my FMLA.</p> <p>22 Q Okay. Are you claiming that she treated you unfairly in</p> <p>23 any way?</p> <p>24 A I did.</p> <p>25 Q Okay. How?</p>
<p style="text-align: right;">Page 146</p> <p>1 A I don't remember. I'd have to look.</p> <p>2 Q Do you recall any specific incident where she claimed</p> <p>3 you were doing something wrong?</p> <p>4 A Yes.</p> <p>5 Q What is that?</p> <p>6 A I was in the MOB, the Breast Care Center.</p> <p>7 Q What does MOB stand for?</p> <p>8 A Mammogram Breast Care Center. It's a abbreviation for</p> <p>9 them, sorry, so Breast Care Center. Back then, we did</p> <p>10 registration down there.</p> <p>11 Q When is this?</p> <p>12 A This was between 2018 to two thousand -- right before</p> <p>13 the pandemic hit, I was working down there all the time.</p> <p>14 Q Is this before it closed?</p> <p>15 A Yes.</p> <p>16 Q Okay. And what did she claim you were doing wrong in</p> <p>17 this time period?</p> <p>18 A She claimed that I was not registering patients fast</p> <p>19 enough for her or for the department and that if I did</p> <p>20 not bring my numbers up, she was going to replace me.</p> <p>21 Q Did you have a targeted goal, a number of patients?</p> <p>22 A No.</p> <p>23 Q Do you know if the hospital had a target?</p> <p>24 A No.</p> <p>25 Q Do you know if anyone complained about you not</p>	<p style="text-align: right;">Page 148</p> <p>1 A I don't have the specifics right in front of me. I</p> <p>2 mean, I do know that I was arguing with her about my</p> <p>3 FMLA, I just don't remember exactly what it was.</p> <p>4 Q Was your FMLA ever denied by her?</p> <p>5 A Yes.</p> <p>6 Q And when was that?</p> <p>7 A I don't know if it's '21 or '22. Not '22, it couldn't</p> <p>8 have been '22. I'd have to look at my paperwork.</p> <p>9 Q So which leave was denied?</p> <p>10 A It wasn't a leave, the leave, it was a -- she said that</p> <p>11 I could not have it because I didn't have enough -- if</p> <p>12 I'm -- I'm -- I'm trying to think back what actually</p> <p>13 happened.</p> <p>14 THE WITNESS: May I go over the paperwork with you?</p> <p>15 MS. VAN DYKE: We can take a break. Yeah, that's</p> <p>16 fine.</p> <p>17 MR. SHEAROUSE: Take a five-minute break?</p> <p>18 MS. VAN DYKE: Yep, let's take a five-minute break.</p> <p>19 (Whereupon a break was taken</p> <p>20 from 12:13 to 12:26 p.m.)</p> <p>21 MS. VAN DYKE: Go back on.</p> <p>22 BY MS. VAN DYKE:</p> <p>23 Q Before the break we were talking about Monica Holbrook</p> <p>24 and you said that she denied your request for a leave or</p> <p>25 a day to take a leave. What was that about?</p>

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<p style="text-align: right;">Page 149</p> <p>1 A Or a day? Well, I do -- I do not remember the exact 2 conversation. I do know that the -- there was a 3 incident where I had to send her two FMLA forms and she 4 ended up not approving one of them, she approved the 5 wrong one, and then I had -- we had -- I don't -- I had 6 an argument, but yet not -- it was just emails back and 7 forth.</p> <p>8 Q So you sent her two FMLA forms?</p> <p>9 A Yes.</p> <p>10 Q What were the forms for?</p> <p>11 A One for my asthma and for my -- for me to have a medical 12 leave because of the pandemic. And then I sent her one 13 for my back.</p> <p>14 Q Did you send them at the same time or are these 15 different --</p> <p>16 A Yes.</p> <p>17 Q Okay. When did you send in the one for your asthma and 18 one for your back, when --</p> <p>19 A The same day, it was in March, right near -- near the 20 end of March, right before -- of 2020.</p> <p>21 Q Okay. And which one was approved?</p> <p>22 A They were finally both approved, but the one that I 23 needed approved immediately was the one where I was 24 going to be off on medical leave.</p> <p>25 Q For --</p>	<p style="text-align: right;">Page 151</p> <p>1 Q Okay. So all were approved at some point?</p> <p>2 A Yes, after going back and forth.</p> <p>3 Q Okay. And you claim that your leaves were interfered 4 with. How is that, that they were interfered with?</p> <p>5 A Please reframe the question?</p> <p>6 Q Yeah. You're claiming that -- one of your claims is 7 FMLA interference, you know, whether you were not 8 allowed to take it or denied it. Are there any 9 instances of that?</p> <p>10 A I'm not sure if it's with her or if it was with an 11 incident with the management that you're referring to.</p> <p>12 Q Okay. And what incident is this?</p> <p>13 A An incident where my manager claimed I was not -- I used 14 my FMLA for my husband when it was not active.</p> <p>15 Q And who was your manager at the time?</p> <p>16 A Renee Carr.</p> <p>17 Q And what happened with that, were you provided the leave 18 day?</p> <p>19 A I did -- what happened was it was denied and then I went 20 to HR.</p> <p>21 Q And then what happened?</p> <p>22 A HR investigated it and approved it.</p> <p>23 Q And approved it?</p> <p>24 A Um-hmm.</p> <p>25 Q Okay. Sorry, could you speak up a little bit?</p>
<p style="text-align: right;">Page 150</p> <p>1 A Short-term disability because of the pandemic.</p> <p>2 Q Okay. So that was the asthma-related one?</p> <p>3 A Yes.</p> <p>4 Q Okay. What was the leave for your back?</p> <p>5 A It was an intermediate.</p> <p>6 Q Intermittent?</p> <p>7 A Intermittent, sorry.</p> <p>8 Q That's okay. And that was -- was it because of back 9 pain?</p> <p>10 A I do have back pain at times, yes.</p> <p>11 Q Do you have a herniated disk?</p> <p>12 A They are starting to have herniated disks, I have 13 degeneration of the spine.</p> <p>14 Q Do you currently have any FMLA leaves running, 15 intermittent or --</p> <p>16 A I have -- I just got my FMLA reinstated yesterday or the 17 day before.</p> <p>18 Q Which leave is this for?</p> <p>19 A It's for my back. My doctor sent in the wrong papers, I 20 have to -- I'm waiting for him to send in the papers for 21 the asthma now so I can send in another one.</p> <p>22 Q And is that also intermittent with the asthma?</p> <p>23 A Um-hmm. Yes.</p> <p>24 Q So is there any leave that Monica Holbrook denied?</p> <p>25 A She -- no.</p>	<p style="text-align: right;">Page 152</p> <p>1 A Yeah, approved it. Sorry.</p> <p>2 Q Anything else with Monica Holbrook?</p> <p>3 A Not that I can think of at this time.</p> <p>4 Q And Renee Carr, we've gone over some of these 5 disciplines, and you just mentioned her about this leave 6 day where she said that you called in for the leave for 7 your husband?</p> <p>8 A Um-hmm.</p> <p>9 Q Is there anything else about Renee Carr that you have 10 complaints about?</p> <p>11 A I have complaints about her and her and Ashley being 12 directed by Beaumont to write me up for things I did not 13 do.</p> <p>14 Q And does that refer to the misbanding of patients?</p> <p>15 A Yes. Or any other correction.</p> <p>16 Q Do you know what the consequences are of misbanding a 17 patient?</p> <p>18 A Yes.</p> <p>19 Q What are those?</p> <p>20 A It would be you could be written up and you'd put the 21 patient in danger.</p> <p>22 Q And how could the patient be placed in danger?</p> <p>23 A They could be given the wrong medication or they would 24 be given -- if they came in a second time, they would 25 be -- their medication would be mixed up with somebody</p>

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<p style="text-align: right;">Page 153</p> <p>1 else's.</p> <p>2 Q In the corrective actions that we went over where you're</p> <p>3 written up for misbanding a patient, do you have any</p> <p>4 reason to believe that your supervisors were lying about</p> <p>5 whether someone from imaging or radiology complained?</p> <p>6 A I have reason to believe, yes.</p> <p>7 Q And what is that?</p> <p>8 A Because I turned them in to the EEOC.</p> <p>9 Q And who did you turn in to the EEOC?</p> <p>10 A Beaumont.</p> <p>11 Q All right. So let's start, do you have any reason to</p> <p>12 believe Ashley was lying that she received a complaint</p> <p>13 about misbanding from imaging or radiology?</p> <p>14 A I don't have evidence of that, no.</p> <p>15 Q The same question for Renee?</p> <p>16 A I do not have the evidence on that.</p> <p>17 Q What about Teri Knight?</p> <p>18 A The same.</p> <p>19 Q And then Jennifer White?</p> <p>20 A I don't know.</p> <p>21 Q Do you have any claims against Teri Knight?</p> <p>22 A Do I have any claims?</p> <p>23 Q Yeah, that she retaliated against you somehow or</p> <p>24 interfered with your leave?</p> <p>25 A Not that I can remember.</p>	<p style="text-align: right;">Page 155</p> <p>1 She admitted to saying what she said.</p> <p>2 Q Okay. So when was this?</p> <p>3 A This was in -- well, it would have to be 2020. Yeah,</p> <p>4 2020, before the pandemic.</p> <p>5 Q And what did Roseanne threaten you over?</p> <p>6 A That's when she claimed that if I didn't get my numbers</p> <p>7 up, she was going to take me out of my position, put</p> <p>8 somebody else down there.</p> <p>9 Q And this is because you -- the claim was that you</p> <p>10 weren't --</p> <p>11 A Fast enough.</p> <p>12 Q -- processing patients fast enough?</p> <p>13 A That's what she claimed.</p> <p>14 Q All right. Do you know if there were cancellations?</p> <p>15 A For?</p> <p>16 Q Patients?</p> <p>17 A Not because of me.</p> <p>18 Q All right. And I believe you said -- do you know if any</p> <p>19 patients complained?</p> <p>20 A Not that I know.</p> <p>21 Q So you then complained about Roseanne to -- was it the</p> <p>22 union steward?</p> <p>23 A With the union steward, and the union steward made a</p> <p>24 meeting with me, Beth, and her.</p> <p>25 Q And what was said during this meeting?</p>
<p style="text-align: right;">Page 154</p> <p>1 Q So no claims at this time?</p> <p>2 A Not that I remember.</p> <p>3 Q What about Beth Karr, she's listed as one of your</p> <p>4 witnesses, too, what does she know about your claims?</p> <p>5 A She does know, she knows about the incidents I had with</p> <p>6 Roseanne, she knows about the -- about the harassment</p> <p>7 and belittlement from her.</p> <p>8 Q And how does she know that, are you saying she witnessed</p> <p>9 it?</p> <p>10 A We had a meeting with the union steward, with herself</p> <p>11 and Roseanne.</p> <p>12 Q And the union steward?</p> <p>13 A Yes.</p> <p>14 Q Who is the --</p> <p>15 A Geri.</p> <p>16 Q I'm sorry?</p> <p>17 A Geri Souve, Souve.</p> <p>18 Q And what happened at this meeting?</p> <p>19 A I was being harassed and I was threatened to be taken</p> <p>20 out of my job, the position in the Breast Care Center,</p> <p>21 and me and Roseanne had a talk, she threatened me, and</p> <p>22 so I went to my union steward and we -- they set up the</p> <p>23 meeting, or she did, Geri did, and so me, Geri, and</p> <p>24 Roseanne sat down and we spoke about it and</p> <p>25 Roseanne -- what do you call it -- give me a second.</p>	<p style="text-align: right;">Page 156</p> <p>1 A We sat down and Geri and me, we explained to Beth</p> <p>2 how -- what the conversation was, and when Roseanne went</p> <p>3 to speak, she said, "Yes, I did say that, I did tell her</p> <p>4 I would take her out of her position."</p> <p>5 Q Okay. And what was the end result of this meeting?</p> <p>6 A Nothing, not a thing got done, nothing. They just</p> <p>7 brushed it under the rug.</p> <p>8 Q Were you taken out of that position?</p> <p>9 A Not yet, not at that point.</p> <p>10 Q You were taken out of that -- when were you taken out of</p> <p>11 the position eventually?</p> <p>12 A Well, the pandemic hit, they closed everything, and then</p> <p>13 when I went back to work, I knew the MOB was -- the</p> <p>14 Breast Care Center was opening again, and I still had my</p> <p>15 full-time hours, I was supposed to go back to the Breast</p> <p>16 Care Center, and my position was given away while I was</p> <p>17 on FMLA before I got back.</p> <p>18 Q Who told you you were supposed to go back to the Breast</p> <p>19 Care Center?</p> <p>20 A That was my position when I left.</p> <p>21 Q And who took that position?</p> <p>22 A Renee Labo.</p> <p>23 Q Do you know why she took that position?</p> <p>24 A According to Roseanne, it was union rules, but I was on</p> <p>25 FMLA.</p>

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<p style="text-align: right;">Page 157</p> <p>1 Q And what were the union rules, if you know?</p> <p>2 A According to them, it goes by higher seniority.</p> <p>3 Q And did Renee have higher seniority?</p> <p>4 A She did, but she denied the job the first time around</p> <p>5 before I even came back. I found out through other</p> <p>6 employees who were working there.</p> <p>7 Q So before you came back in July, Renee turned down the</p> <p>8 Breast Care Center?</p> <p>9 A Yes, she did.</p> <p>10 Q When was this?</p> <p>11 A That was the week before I came back, I was still</p> <p>12 talking to some of the girls on the phone.</p> <p>13 Q And who told you this?</p> <p>14 A I used to talk to -- what do you call it? I talked to</p> <p>15 Tina every once in a while, I talked to -- I would talk</p> <p>16 sometimes to Jessica. They said that nobody else wanted</p> <p>17 that position, nobody wanted to work down there, the</p> <p>18 Breast Care Center, because it's too slow, and they said</p> <p>19 that Renee denied it and I was next in line, so I would</p> <p>20 be getting my position back. And then -- then I turn</p> <p>21 around and after she denied it, Roseanne still gave it</p> <p>22 to her and told her she -- that she was allowed to have</p> <p>23 it.</p> <p>24 Q Do you know if Renee asked for it again?</p> <p>25 A I was told she did. Or no, I do not know. I was not</p>	<p style="text-align: right;">Page 159</p> <p>1 do that.</p> <p>2 Q And your understanding is that Katie started working</p> <p>3 part-time in the Breast Care Center?</p> <p>4 A She was working part-time until they opened full-time,</p> <p>5 she was working down there all that time because nobody</p> <p>6 else wanted the position.</p> <p>7 Q And then did she leave the hospital, like leave</p> <p>8 employment?</p> <p>9 A Yes. Well, not right -- I don't -- not right after she</p> <p>10 came back down there, that's not what I'm saying, I'm</p> <p>11 just saying she left the hospital. A month or so later</p> <p>12 after that, I'm not exactly sure when she left.</p> <p>13 Q All right.</p> <p>14 A All I know is she moved.</p> <p>15 Q And is that when Renee went into the position, if you</p> <p>16 know?</p> <p>17 A Renee went into the position the same day I came back to</p> <p>18 work.</p> <p>19 Q Was there anyone in between Katie and Renee or did --</p> <p>20 A There might have been. I didn't have access to all of</p> <p>21 the emails that were coming through. I had some access,</p> <p>22 but I did not have all of it.</p> <p>23 Q Before you went on your leave in March of 2020, were</p> <p>24 you -- you were working in, I think you said, triage?</p> <p>25 A Yeah, because they closed the -- right, that last month.</p>
<p style="text-align: right;">Page 158</p> <p>1 there.</p> <p>2 Q Do you know when Renee was placed in that position</p> <p>3 specifically?</p> <p>4 A Yes.</p> <p>5 Q When was it?</p> <p>6 A The same exact day I started, July 6th.</p> <p>7 Q Do you know who was working there before Renee?</p> <p>8 A It was Katie. I don't remember her last name. She</p> <p>9 left, she moved.</p> <p>10 Q Do you know if Katie had more seniority?</p> <p>11 A Uh-uh.</p> <p>12 Q How did it work out that Katie was in that position, if</p> <p>13 you know?</p> <p>14 A Because that's when the Breast Care Center had just</p> <p>15 opened and she was doing part-time hours.</p> <p>16 Q So Katie was part-time?</p> <p>17 A I thought she was full-time, but I -- during that time</p> <p>18 when they started -- when the pandemic started to get</p> <p>19 under control, I think they had a working pool thing</p> <p>20 going.</p> <p>21 Q And what do you mean by working pool?</p> <p>22 A I guess some girls, if you were part-time or you're</p> <p>23 contingent, you had to call every day to see if you</p> <p>24 got -- if there was hours available, I guess. That's</p> <p>25 what I was told as how it was working. I never had to</p>	<p style="text-align: right;">Page 160</p> <p>1 Q Okay.</p> <p>2 A In March.</p> <p>3 Q So you were working in the triage --</p> <p>4 A I was working in triage and I was in the back, I -- we</p> <p>5 were doing both, everybody was.</p> <p>6 Q How long were you doing that for before you went on</p> <p>7 leave?</p> <p>8 A I do believe the pandemic hit around beginning of March,</p> <p>9 I do believe, if I'm not mistaken, and then I went on</p> <p>10 leave at the end of March because I was not allowed to</p> <p>11 have an N-95 per Beaumont.</p> <p>12 Q So when you return in July, you are working -- where do</p> <p>13 you go to work then?</p> <p>14 A Well, by then, I lost my position and I had to work -- I</p> <p>15 had to work at a -- it's called curbside for COVID</p> <p>16 patients.</p> <p>17 Q How long were you working there for?</p> <p>18 A Six months or a year, I don't exactly know how long.</p> <p>19 Q After that, where did you go?</p> <p>20 A Still in the -- the same department, it's just a</p> <p>21 different posi -- just a -- well, one of the girls</p> <p>22 retired, actually, one of the girls retired, so I was</p> <p>23 able to get a day shift in the -- working in the back or</p> <p>24 in triage, they call it complete.</p> <p>25 Q And how long were you in that position for?</p>

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1 A I'm still there.

2 Q So your position when you went from curbside, it
3 was -- you stayed in the same position, it was just that
4 the location changed?

5 A No, the same location, it's my shift changed. See, when
6 I went out on medical leave, I was doing 7:00 to 3:30.
7 When I came back, I had to do 9:30 to 5:00 or 5:30, I
8 think so, I think that's -- or 9:00 to 5:30, it might
9 have been 9:00 to 5:30.

10 Q So then your --

11 A Then I switched when the other lady retired, I was able
12 to switch to the shift I have now, 6:00 to 2:30.

13 Q 6:00 to 2:30?

14 A That's what I'm on now.

15 Q All right. Have you looked for any other jobs?

16 A Yes.

17 Q And where have you looked?

18 A Henry Ford.

19 Q Did you apply there?

20 A Yes.

21 Q When did you apply?

22 A Multiple times, all the time. I apply on Indeed,
23 basically, through most of them.

24 Q So you go through Indeed to apply?

25 A Most of them I do.

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1 Q Is there any other service or website you use to apply?

2 A I've gone through the Henry Ford website, I've gone
3 through St. Joseph's, so I've applied.

4 Q At St. Joseph's, as well?

5 A Yeah.

6 Q Have you ever received an interview?

7 A From them? No.

8 Q Do you know what's happened with your application, is it
9 just kind of -- is it on hold or --

10 A They've just not gotten back with me, they always just
11 send me back noes. I've also tried to transfer multiple
12 times out of the department.

13 Q To which department?

14 A Any of them. To a different -- even to a
15 different -- even to transfer to a different department
16 or a different hospital, but by the time I go
17 through -- I went to transfer, I'd be written up again.
18 You can't transfer if you have a corrective action on
19 you.

20 Q So did you apply for a transfer?

21 A I did apply, but it didn't work out because they gave me
22 another corrective action to stop me.

23 Q Okay. Which time did you -- which time are you talking
24 about, like when did you apply?

25 A I don't remember.

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1 Q Well, if you're claiming that --

2 A I'm just saying I don't remember because every time I
3 went to apply for something and I thought I was going to
4 get something, then I would be -- get a letter from
5 Beaumont saying you're ineligible because of this.

6 Q How many times did you apply for a transfer?

7 A Two or three.

8 Q When were those, approximately?

9 A As soon as I would get one of these -- get these all
10 completely gone, that's when I would apply.

11 Q How long did they last on your record for?

12 A If I'm not mistaken, I do believe it's six months.

13 Q And what departments were you trying to transfer into?

14 A I tried to transfer to the orthopedic one in Taylor.

15 I did get an interview, but I did not get -- I

16 wasn't -- that one, I did get an interview, but I never
17 got picked.

18 Q And why do you -- let's take Ashley, why do you think

19 Ashley wrote you up?

20 A Because Beaumont's pushing them to.

21 Q Who in Beaumont?

22 A Management, higher up.

23 Q And who is that?

24 A I think they're hara -- they're telling them to

25 basically keep me written up so, that way, I can't

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1 transfer out.

2 Q And why do you believe that?

3 A Because every time I get one step forward, they do
4 another -- pull this correction on me.

5 Q And who in management?

6 A I don't know who's higher up than Ashley and them.
7 She's just doing what her boss is telling her.

8 Q And who is her boss?

9 A I don't know.

10 Q Do you know of any specific conversations where Ashley
11 was told, or Renee, actually, any of your supervisors
12 were told they had to write you up?

13 A No.

14 Q We talked about Beth. So you also have listed Shauna
15 Willette.

16 A Okay.

17 Q Who is Shauna?

18 A She used to be a supervisor. She was only there for a
19 very short time, if I'm not mistaken, maybe six to eight
20 months.

21 Q And what does Shauna know about your claims, if
22 anything?

23 A I don't know if she knows anything about my claims, but
24 I know she had issues with Roseanne.

25 Q And what do you know about that?

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<p style="text-align: right;">Page 165</p> <p>1 A All Shauna said was that she couldn't deal with working 2 with Roseanne, she was a very hard person to work with. 3 Q Do you know what those issues were? 4 A No, she did not go into detail. 5 Q Did she say -- she didn't describe the issues, but did 6 she say why she felt that she couldn't deal with 7 Roseanne? 8 A She always had to be in control, I know that. It's the 9 way she treats people, it's the way she belittles you. 10 Q And so did Shauna claim that Roseanne was belittling 11 her? 12 A She did not claim that to me. 13 Q Okay. But did other people complain that Roseanne would 14 belittle them? 15 A Yes. 16 Q Who else? 17 A A lot of the girls. They just stand up to her, though, 18 where I would not because she's my superior. 19 Q Okay. So who are the other women who would stand up to 20 Roseanne? 21 A There was Mary. I call her Mary Kay, that's -- because 22 she -- she's retired. I know Pam used to stand up to 23 her. Tina would stand up to her. Oh, what was her 24 name? There's another lady, I can't remember her name, 25 she's the one I took my -- when she retired, took her</p>	<p style="text-align: right;">Page 167</p> <p>1 Q Yeah, take your time so you can try and remember. 2 A If I'm right, Cheryl Cobb may have been the person I was 3 trying to contact before I came back to work, and that 4 lady, too, is HR, and I was complaining to them to help 5 me get my position back in the Breast Care Center, I do 6 believe, and nobody would help me, everybody kept saying 7 it is a union job. FMLA is above the union. 8 Q Okay. So they were saying it was based on union -- 9 A Rules. 10 Q -- union rules? Did you talk to the union about this? 11 A Yes. 12 Q And who did you speak with? 13 A Geri. 14 Q And what did Geri say? 15 A Oh, she can't do nothing, she's on their side. 16 Q What do you mean, their side? 17 A Every time there's a issue, she's in there talking to 18 the manager before she even sees me, which is against 19 union rules to begin with. She's not for us. She's 20 just sitting there, she's for them, she's for Beaumont. 21 Q Did Geri explain to you that the position was determined 22 by seniority? 23 A That's what she claimed. 24 Q Do you have reason to believe that's false? 25 A Yes.</p>
<p style="text-align: right;">Page 166</p> <p>1 position, I can't remember her name right now. 2 Q So did you ever see Roseanne belittling them? 3 A Yeah, she's got in people's -- other people's faces. 4 Q And whose face, if you recall, has she gotten into? 5 A Any one of those people. 6 Q So like Mary, Pam -- 7 A Yeah. 8 Q -- Tina? Do you know if she's written them up, 9 Roseanne? 10 A I don't know. 11 Q Do you know if anyone has received write-ups from 12 Roseanne? 13 A I'm not -- I wouldn't know any of that. 14 Q Anything else about Shauna Willette? 15 A No. 16 Q What about Cheryl Cobb? She's a leave specialist. 17 A I don't remember the details on that. I know she's in 18 the FMLA too. 19 Q Okay. Do you have any claims that she denied a leave 20 for you? 21 A I don't remember. 22 Q What about Jonelle Warner? 23 A I don't remember her name. 24 Q She is in HR. 25 A Oh. Okay. Give me a minute. This is a long time ago.</p>	<p style="text-align: right;">Page 168</p> <p>1 Q Why? 2 A Because when it comes to when you're off on medical 3 leave and you're on FMLA, then it is above the union 4 rules. 5 Q What about -- and you were saying -- was this Cheryl 6 Cobb who you were complaining to or Jonelle Warner, or 7 both? 8 A I think they were both. I think Jonelle Warner, if I'm 9 not mistaken, she might be an HR person, I'm not sure, I 10 only -- I called HR and I wrote names down and, like I 11 said, this is a long time ago. 12 Q All right. What about Renee Labo, and I know you 13 described that she took your position in the Breast Care 14 Center, do you have any other issues with her or -- 15 A No. 16 Q Okay. Do you believe that Renee was working against you 17 when she took that position? 18 A Working against me? 19 Q Yes. 20 A Please rephrase it. 21 Q Yeah. Do you believe that Renee took the position so 22 that you wouldn't, you couldn't? 23 A I'm not sure. 24 Q Did you ever ask Renee why she took the position? 25 A No.</p>

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<p style="text-align: right;">Page 169</p> <p>1 Q Did you ever have conversations with Renee about being</p> <p>2 in the position in the Breast Care Center?</p> <p>3 A No.</p> <p>4 Q Is she still in that position?</p> <p>5 A No.</p> <p>6 Q Where did she go?</p> <p>7 A Well, the Breast Care Center finally closed after two</p> <p>8 years -- well, they didn't close. It</p> <p>9 changed -- Beaumont changed the rules so that the clerks</p> <p>10 would have to do registration's job so they wouldn't</p> <p>11 have to have us down there no more. So she basically</p> <p>12 lost her position at the Breast Care Center and then she</p> <p>13 had to come back down to where we are all in the ER.</p> <p>14 Q So she's in the ER?</p> <p>15 A Not no more.</p> <p>16 Q She left?</p> <p>17 A She left. She transferred somewhere.</p> <p>18 Q Do you recall when they pulled patient registration from</p> <p>19 the Breast Care Center?</p> <p>20 A It wasn't until at least a year, year and a half after I</p> <p>21 came back.</p> <p>22 Q Okay. I know we went through your medications before.</p> <p>23 What dosage of medications are you on today?</p> <p>24 A Xanax, 0.5.</p> <p>25 Q Is it once a day, twice, or as needed?</p>	<p style="text-align: right;">Page 171</p> <p>1 A Okay. Please reform the question?</p> <p>2 Q Sure. Like are there other patient registration staff</p> <p>3 members, like, for instance, with the misbanding,</p> <p>4 where --</p> <p>5 A Yeah.</p> <p>6 Q -- you know they've misbanded, but they didn't get</p> <p>7 written up?</p> <p>8 A Yeah, like Kristen.</p> <p>9 Q Kristen?</p> <p>10 A Um-hmm.</p> <p>11 Q And when was this?</p> <p>12 A It was over a year ago. She's not been in that</p> <p>13 department, she's transferred to a different department.</p> <p>14 Q Do you know what happened?</p> <p>15 A I was told she was banding patients wrong all the time,</p> <p>16 nurses talked about it.</p> <p>17 Q I was just going to ask who told you that?</p> <p>18 A The nurses talked about it.</p> <p>19 Q Which nurses specifically?</p> <p>20 A The one in the triage.</p> <p>21 Q Do you know her name?</p> <p>22 A No.</p> <p>23 Q Do you know if she complained about Kristen?</p> <p>24 A A lot of nurses complained about Kristen.</p> <p>25 Q Okay. Do you know who they complained to?</p>
<p style="text-align: right;">Page 170</p> <p>1 A Twice a day.</p> <p>2 Q Okay. What about the Buspar?</p> <p>3 A That is once a day, I do believe.</p> <p>4 Q And how much?</p> <p>5 A I do believe it's 15.</p> <p>6 Q What about Prozac?</p> <p>7 A That's 20 milligrams.</p> <p>8 Q Once a day?</p> <p>9 A He had me on twice a day, but he's trying to get me on</p> <p>10 the Seroquel and get me off of either both or one.</p> <p>11 Q We talked about Xanax.</p> <p>12 And the Seroquel, is that once a day?</p> <p>13 A Yes.</p> <p>14 Q At how many milligrams?</p> <p>15 A That one, I don't know.</p> <p>16 Q Okay. When did you first see a psychiatrist?</p> <p>17 A I seen him in September or October of -- I'd have to</p> <p>18 look at my paperwork for the exact date.</p> <p>19 Q Is it in 2020, after your first leave, or was it</p> <p>20 recently?</p> <p>21 A It was -- I don't -- it wasn't in 2020. I think it was</p> <p>22 in '21.</p> <p>23 Q Okay. And I want to go through to try and narrow this</p> <p>24 down. Who are you comparing yourself to where you feel</p> <p>25 like they've been treated differently than you?</p>	<p style="text-align: right;">Page 172</p> <p>1 A From -- I don't know who they actually complained to. I</p> <p>2 just know that they complained about her in front of me,</p> <p>3 but I do know they mentioned they had told our managers.</p> <p>4 Q So you don't know if the nurses went to management?</p> <p>5 A I do not know.</p> <p>6 Q And at the time, who was the supervisor?</p> <p>7 A I'm not sure.</p> <p>8 Q Is there anyone else you're claiming hasn't been</p> <p>9 disciplined or hasn't been written up, whereas you have</p> <p>10 been?</p> <p>11 A I don't know names. I hear -- I just hear about it.</p> <p>12 Q But you don't have any names?</p> <p>13 A No, I don't know their names.</p> <p>14 MS. VAN DYKE: I'd like to take just a quick break.</p> <p>15 (Whereupon a break was taken</p> <p>16 from 1:04 to 1:20 p.m.)</p> <p>17 MS. VAN DYKE: We can go back on the record.</p> <p>18 BY MS. VAN DYKE:</p> <p>19 Q For the corrective actions, so your position is that</p> <p>20 these are made up because you didn't misband. Did you</p> <p>21 ever complain to the union about them?</p> <p>22 A Yes.</p> <p>23 Q And about each corrective action?</p> <p>24 A Yes.</p> <p>25 Q And who did you go to?</p>

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<p style="text-align: right;">Page 173</p> <p>1 A Geri, the only person I had.</p> <p>2 Q And what did Geri say?</p> <p>3 A She didn't do anything.</p> <p>4 Q So --</p> <p>5 A So I kept ask -- I kept sending emails to her, I want to</p> <p>6 file a grievance, I want to file a grievance, she</p> <p>7 wouldn't do it, she didn't do it, and by the time -- by</p> <p>8 the time I found out and I started looking in the union</p> <p>9 book, it had already been too late because she</p> <p>10 never -- I only have so many days to file a grievance.</p> <p>11 Q Okay. And do you know if Geri spoke with anyone about</p> <p>12 the corrective actions?</p> <p>13 A About mine?</p> <p>14 Q Correct.</p> <p>15 A Not that I know of, I don't know.</p> <p>16 Q Okay. Do you know who Ashley Crowley is?</p> <p>17 A Oh, that's -- Ashley -- that's my boss, Ashley --</p> <p>18 Q Crowley?</p> <p>19 A I think she just changed her name to Hendley, I think</p> <p>20 she just changed her name.</p> <p>21 Q Was there an Ashley Crowley who was working in the</p> <p>22 Breast Care Center?</p> <p>23 A Oh, that Ashley, okay, all right.</p> <p>24 Q Do you know if she ever complained about your</p> <p>25 performance?</p>	<p style="text-align: right;">Page 175</p> <p>1 Breast Care Center and the write-ups. Is there anything</p> <p>2 else that you're complaining about that you were</p> <p>3 retaliated against?</p> <p>4 A I was retaliated because I was supposed to have an N-95</p> <p>5 so I would not have to leave work, and then I had to</p> <p>6 take another leave because of all the stress, I kept</p> <p>7 getting written up, I have another medical leave for</p> <p>8 that.</p> <p>9 Q Is there any other thing that you claim that Beaumont or</p> <p>10 a supervisor, how they treated you unfairly or</p> <p>11 retaliated against you other than what we discussed</p> <p>12 today?</p> <p>13 A Only by the leave for the -- for those two times because</p> <p>14 of Beaumont.</p> <p>15 Q And you requested -- you're claiming you requested an</p> <p>16 accommodation to wear the N-95 mask, correct?</p> <p>17 A Yes, I did.</p> <p>18 Q Did you ever request any accommodation in writing?</p> <p>19 A No.</p> <p>20 Q And did you ever request any other type of accommodation</p> <p>21 other than the N-95 mask?</p> <p>22 A I did not -- I needed the N-95 mask no matter what for</p> <p>23 even if I was working out in the front or in the back</p> <p>24 because everybody else was still -- could have been</p> <p>25 carrying the COVID.</p>
<p style="text-align: right;">Page 174</p> <p>1 A I know she said I wasn't going fast enough one time, she</p> <p>2 came to me.</p> <p>3 Q She said that to you?</p> <p>4 A Yes.</p> <p>5 Q All right. And do you know if she complained to</p> <p>6 Roseanne?</p> <p>7 A I don't know.</p> <p>8 Q In one of your -- in your Complaint, so we've discussed</p> <p>9 what you're claiming is you've been retaliated against,</p> <p>10 and to sum that up, we've discussed the shift change and</p> <p>11 not being allowed to go back to the Breast Care Center,</p> <p>12 we've also discussed the write-ups themselves, and you</p> <p>13 also have a claim that you were forced to take unpaid</p> <p>14 leave. Do you know what -- do you recall what that's</p> <p>15 about, that situation?</p> <p>16 A Well, in March I did because I was not allowed to have a</p> <p>17 N-95.</p> <p>18 Q So when you went on your leave in March of 2020, that's</p> <p>19 what you're claiming was the unpaid leave?</p> <p>20 A Yeah. I had short-term disability with it, but it was</p> <p>21 only -- not even a quarter of my check.</p> <p>22 Q And was anyone in patient registration allowed at that</p> <p>23 time to have an N-95 mask?</p> <p>24 A No.</p> <p>25 Q So the unpaid leave, we have the shift change in the</p>	<p style="text-align: right;">Page 176</p> <p>1 Q And for these things, the write-ups and the shift change</p> <p>2 and everything, are you claiming that this happened</p> <p>3 because you took FMLA leaves?</p> <p>4 A No, it's because I turned them in to the EEOC and</p> <p>5 because I took -- that's why. So I came back, I turned</p> <p>6 Beaumont in to the EEOC for not allowing me to have an</p> <p>7 N-95.</p> <p>8 Q Okay. So you filed a complaint with the EEOC?</p> <p>9 A Yes, I did.</p> <p>10 Q About not being allowed to wear the N-95?</p> <p>11 A Yes, I did. And the harassment.</p> <p>12 Q And I think at some point you said that the EEOC came to</p> <p>13 Beaumont?</p> <p>14 A Yes.</p> <p>15 Q When was that?</p> <p>16 A I don't know the exact dates. I just know that</p> <p>17 they -- somebody had came to see Beth, and it was odd,</p> <p>18 she only introduced me to her, but did not give me her</p> <p>19 name, and said, "This is Sheryl," and then they walked</p> <p>20 away. Nobody else was in the office.</p> <p>21 Q How do you know this person was from the EEOC?</p> <p>22 A I assumed she was.</p> <p>23 Q Why is that?</p> <p>24 A It was just the way she says, "Oh," and then walks away,</p> <p>25 like she knew something about me, like they were talking</p>

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<p style="text-align: right;">Page 177</p> <p>1 about me in the office.</p> <p>2 Q Do you know who this person was?</p> <p>3 A No.</p> <p>4 Q You don't have their name?</p> <p>5 A No. They didn't give me a name.</p> <p>6 Q And they -- he or she?</p> <p>7 A She.</p> <p>8 Q She. Did she introduce herself to you?</p> <p>9 A She did not introduce herself.</p> <p>10 Q And did Beth introduce her to you?</p> <p>11 A No, Beth introduced her to me.</p> <p>12 Q Do you have any other information about the EEOC coming</p> <p>13 to Beaumont?</p> <p>14 A I have my papers and my -- just like you do, so they did</p> <p>15 get there, because that's the only way they can finish</p> <p>16 doing an investigation, is they have to go out there and</p> <p>17 investigate.</p> <p>18 Q Do you know if they interviewed anyone at Beaumont?</p> <p>19 A I do not know.</p> <p>20 Q So the shift change and not being allowed in the Breast</p> <p>21 Care Center, the write-ups, that's related to your EEOC</p> <p>22 charge?</p> <p>23 A Yeah.</p> <p>24 Q Okay. Now, you're claiming -- we covered your emotional</p> <p>25 distress damages in the beginning. You're also claiming</p>	<p style="text-align: right;">Page 179</p> <p>1 Q That was back in 2019?</p> <p>2 A Yes, that was prior to the pandemic and all that.</p> <p>3 Q Okay. So your second leave, how long were you out for?</p> <p>4 A The second leave, I was out, again, with the pandemic, I</p> <p>5 was out for almost five and a half months, maybe almost</p> <p>6 six, I don't know the exact weeks.</p> <p>7 Q And that was unpaid?</p> <p>8 A It was paid, it was short-term disability, so I only got</p> <p>9 a portion of my check.</p> <p>10 Q What about the second leave?</p> <p>11 A The second leave was the same thing, short-term</p> <p>12 disability, but it still wasn't enough to get by,</p> <p>13 that's why I had to do -- I had to pull money out of my</p> <p>14 401 -- well, 403(b), not (k), sorry.</p> <p>15 Q Okay. Your 403(b)?</p> <p>16 A Yeah.</p> <p>17 Q Is it a loan out of the 403(b) that you have to re-pay</p> <p>18 back?</p> <p>19 A I pay it back every month.</p> <p>20 Q Are you still paying it back?</p> <p>21 A Yes.</p> <p>22 Q Are you claiming any lost benefits other than what's</p> <p>23 related to the 403(b)?</p> <p>24 A No, I did not lose my benefits during that time.</p> <p>25 Q Okay. And just to clarify, as well, you requested the</p>
<p style="text-align: right;">Page 178</p> <p>1 that you have economic damages?</p> <p>2 A Yes.</p> <p>3 Q And so what are those damages?</p> <p>4 A I lost my hours, I did not get my full pay. If I would</p> <p>5 have been able to wear an N-95, I would not have had to</p> <p>6 take a medical leave the first time around. And then I</p> <p>7 had to take another medical leave for my -- for my</p> <p>8 second leave.</p> <p>9 Q Your second leave was for what?</p> <p>10 A Mental.</p> <p>11 Q For mental health?</p> <p>12 A Yes. And I had to take out -- I had to take money out</p> <p>13 of my 401(k) to help pay for my bills while I was off</p> <p>14 because I was not going to get enough.</p> <p>15 Q Okay. So your second leave was for like a mental health</p> <p>16 leave?</p> <p>17 A It was a mental health leave because Beaumont was</p> <p>18 harassing me so much.</p> <p>19 Q And when was this?</p> <p>20 A That was in the last, I do believe, just -- was it last</p> <p>21 year? I think it -- I don't know if it was twenty -- if</p> <p>22 it was '22 or '21, I'd have to look at my records.</p> <p>23 Q Did you take any other leaves for surgeries at all?</p> <p>24 A That was in -- I did, but that was for three weeks</p> <p>25 on -- give me a minute -- it was December 5th, 2019.</p>	<p style="text-align: right;">Page 180</p> <p>1 N-95 mask, but is there anything else that you requested</p> <p>2 that was denied?</p> <p>3 A I requested the respirator, but I did not get one. I</p> <p>4 was not denied, but I was not offer -- I was</p> <p>5 never -- nothing came of it.</p> <p>6 Q Okay. Anything else?</p> <p>7 A Not that I can think of at this time.</p> <p>8 Q Did you ever -- have you filed an unfair labor charge</p> <p>9 against the union?</p> <p>10 A Yes.</p> <p>11 Q When was that?</p> <p>12 A This past year.</p> <p>13 Q Okay. When, about what month?</p> <p>14 A I don't remember exactly, to tell you the honest truth.</p> <p>15 Q And what's the basis of your claim?</p> <p>16 A Because Geri, the union steward, would not file any</p> <p>17 grievances and help me get you guys off my back.</p> <p>18 Q And so it was about the corrective actions, not filing</p> <p>19 grievances about them?</p> <p>20 A It was about filing grievances, I wanted to file a</p> <p>21 grievance, she never followed through, and on how</p> <p>22 Beaumont was harassing me.</p> <p>23 Q All right. And specifically, how was Beaumont harassing</p> <p>24 you?</p> <p>25 A Writing me up all the time, making me have panic attacks</p>

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<p style="text-align: right;">Page 181</p> <p>1 every time they -- every time all three managers show</p> <p>2 up, I'm almost 99 percent sure I'm going to be wrote up</p> <p>3 that day.</p> <p>4 Q And who are the three managers you're referring to?</p> <p>5 A At the time, it was Jennifer White, Ashley, and Renee,</p> <p>6 or it would be -- or it would be Teri, Jennifer, Ashley,</p> <p>7 Renee, or it would be the HR meeting on a Zoom thing.</p> <p>8 Q How often did you see them meet up?</p> <p>9 A About maybe every two weeks.</p> <p>10 Q Every two weeks? And did you receive a write-up every</p> <p>11 time they met?</p> <p>12 A Not every time, but I still was afraid every time they</p> <p>13 all showed up I was going to be wrote up.</p> <p>14 Q Other than the corrective actions we've discussed today,</p> <p>15 are you aware of any other write-ups you've received?</p> <p>16 A No.</p> <p>17 Q When they would all meet, why did you believe you'd be</p> <p>18 written up?</p> <p>19 A I was scared of them. Because every time they came</p> <p>20 together, that's when I would be called into the office.</p> <p>21 Q Did you see them call other people into the office?</p> <p>22 A No.</p> <p>23 Q Just you?</p> <p>24 A Yes.</p> <p>25 Q Did Jennifer overlap with Renee and Ashley?</p>	<p style="text-align: right;">Page 183</p> <p>1 State of Michigan)</p> <p>2 County of Oakland)</p> <p>3 Certificate of Notary Public - Court Reporter</p> <p>4</p> <p>5 I certify that this transcript is a complete, true, and</p> <p>6 correct record of the testimony of the witness held in this</p> <p>7 case.</p> <p>8</p> <p>9 I also certify that prior to taking this deposition, the</p> <p>10 witness was duly sworn or affirmed to tell the truth.</p> <p>11</p> <p>12 I further certify that I am not a relative or an</p> <p>13 employee of or an attorney for a party; and that I am not</p> <p>14 financially interested, directly or indirectly, in the</p> <p>15 matter.</p> <p>16</p> <p>17 I hereby set my hand this 11th day of April, 2023.</p> <p>18</p> <p>19</p> <p>20 <i>Elizabeth G. LaBarge</i></p> <p>21</p> <p>22 Elizabeth G. LaBarge, CSR-4467</p> <p>23 Certified Shorthand Reporter</p> <p>24 Notary Public, Wayne County, Michigan</p> <p>25</p>
<p style="text-align: right;">Page 182</p> <p>1 A So Renee was there first, she was under -- underneath</p> <p>2 Roseanne at one point, I do believe, if I'm not</p> <p>3 mistaken, and then Roseanne went to a different position</p> <p>4 and then Ashley showed up, and then Beth left and then</p> <p>5 Teri took over. So basically, Ashley was above Renee, I</p> <p>6 do believe, but I don't know for sure because I've never</p> <p>7 asked them.</p> <p>8 Q So in this lawsuit, you're claiming that every</p> <p>9 supervisor you've had has retaliated against you?</p> <p>10 A I believe Beaumont is telling them to.</p> <p>11 Q Okay.</p> <p>12 A Yes.</p> <p>13 Q And what do you base that on?</p> <p>14 A The history of every time they get together, I get one</p> <p>15 of those write-ups.</p> <p>16 MS. VAN DYKE: I have no other questions right now.</p> <p>17 MR. SHEAROUSE: I don't have anything.</p> <p>18 (Deposition concluded at 1:36 p.m.)</p> <p>19 * * *</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	